

WHAT DOES RDG CAPITAL MANAGEMENT LLC DO WITH YOUR PERSONAL INFORMATION?

WHY?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
WHAT?	<p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> ▪ Social Security number and financial information ▪ Account balances and assets ▪ Account statements and trade tickets
HOW?	All financial companies need to share clients' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their clients' personal information, the reasons RDG Capital Management chooses to share and whether you can limit this sharing.

Reasons we can share your personal information:	Does RDG Capital Management share?	Can you limit this sharing?
For our everyday business purposes: to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes: to offer our products and services to you	Yes	No
For joint marketing with other financial companies	No	Not Applicable
For our affiliates' everyday business purposes: information about your transactions and experiences	No	Not Applicable
For our affiliates' everyday business purposes: information about your creditworthiness	No	Not Applicable
For our affiliates to market to you	Yes	No
For nonaffiliates to market to you	No	Not Applicable

Questions:

Call 585.673.2690

or visit www.rdgcapitalmanagement.com

Who We Are:	
Who is providing this notice?	RDG Capital Management LLC
What We Do:	
How does RDG Capital Management protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
How does RDG Capital Management collect my personal information?	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> ▪ Open an account or enter trades ▪ Discuss objectives or transfer balances ▪ Seek advice about investments ▪ Tell us about your investment or retirement portfolio or earnings
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> ▪ Sharing for affiliates' everyday business purposes—information about your creditworthiness ▪ Affiliates from using your information to market to you ▪ Sharing for nonaffiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing.</p>
Definitions:	
Affiliates	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> ▪ We do share with our affiliates
Nonaffiliates	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> ▪ We do not share with nonaffiliates so they can market to you
Joint marketing	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> ▪ We do not jointly market

Form ADV

A copy of our updated Form ADV is available at our website, www.rdgcapitalmanagement.com.

You can also contact us at any time, and we will mail you a copy.