

## NOTICE OF PRIVACY POLICY

January 1, 2022

**OUR COMMITMENT TO YOUR PRIVACY:** Houlihan Capital, LLC (HOULIHAN CAPITAL) is committed to protecting the confidentiality and security of information we collect about our customers and clients. We will not share non-public information about you (“Information”) with third parties without your consent, except for the specific purposes described below. This notice describes the Information we may gather and the circumstances under which we may share it.

**WHY WE COLLECT AND HOW WE USE INFORMATION:** We limit the collection and use of Information on a need-to-know basis, typically the minimum required in order to deliver superior service. The Information may also be disclosed as required by law, and to securities regulatory agencies or government agencies.

**HOW WE GATHER INFORMATION:** We get most Information directly from you when Houlihan Capital engages you as a client and as services are provided by the firm— whether in person, by telephone or electronically. We may verify this information or get additional Information from consumer reporting agencies, business reporting agencies, or public sources.

**HOW WE PROTECT INFORMATION:** We may disclose any Information as directed by you or when we believe it necessary for the conduct of our business, or where law requires disclosure. For example, Information may be disclosed for audit or research purposes, to attorneys or other professionals, or to law enforcement and regulatory agencies, for example, to help us detect and prevent fraud. In addition, we may disclose Information to third party service providers (i) to enable them to provide business services for us, such as performing computer related or data maintenance or processing services for us (ii) to facilitate the processing of transactions requested by you, (iii), to assist us in offering products and services to you (iv) for credit review and reporting purposes. Except in those specific, limited situations, without your consent, **we do not make disclosures** of Information to other companies who may want to sell their products or services to you. For example, **we do not sell customer lists and we will not sell your name.** It is HOULIHAN CAPITAL’s policy to require all third parties other than your broker that are to receive any Information to sign strict confidentiality agreements.

**TO WHOM THIS POLICY APPLIES:** This Privacy Policy applies to financial products or services provided by HOULIHAN CAPITAL to our customers and clients.

**ACCESS TO AND CORRECTION OF INFORMATION:** If you desire to review an Information file in our possession relating to a transaction, please contact the associated person representing HOULIHAN CAPITAL. If you notify us that any Information is incorrect, we will review it and if we agree, we will correct our records. If we do not agree, you may submit a short statement of dispute, which we will include in future disclosures of the disputed Information. Information collected in connection with, or in anticipation of, any claim or legal proceeding will not be made available.

**Further Information:** We reserve the right to change this Privacy Policy. The examples contained within this Privacy Policy are illustrations and they are not intended to be exclusive. This notice complies with Federal Law and SEC Regulations regarding privacy. You may have additional rights under other foreign or domestic laws that may apply to you.

**Business Continuity Plan**

In accordance with FINRA requirements, HOULIHAN CAPITAL maintains a Business Continuity Plan that describes what steps will be taken to ensure the continuity of our business operation in the event of an emergency or significant business disruption. The plan has been designed with procedures to ensure that client documentation will be accessible and that contact between HOULIHAN CAPITAL and its customers and clients will be sustained. If you would like a copy, please contact our office.