

| FACTS | WHAT DOES INTEROCEAN CAPITAL GROUP, LLC DO WITH YOUR PERSONAL INFORMATION? |
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| 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 • Income • Employment and residential information • Cash balance • Security balances • Transaction detail history • Investment objectives, goals, and risk tolerance <p>When you are <i>no longer</i> our customer, we continue to share your information as described in this notice.</p> |
| How? | All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons InterOcean Capital Group, LLC chooses to share; and whether you can limit this sharing. |

| Reasons we can share your personal information | Does InterOcean Capital Group, LLC share? | Can you limit this sharing? |
|--|---|-----------------------------|
| For our everyday business purposes— such as 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 | We do not share |
| For our affiliates' everyday business purposes— information about your transactions and experiences | Yes | No |
| For our affiliates' everyday business purposes— information about your creditworthiness | No | We do not share |
| For nonaffiliates to market to you | No | We do not share |

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| Questions? | Call InterOcean Capital Group, LLC at 312-648-1720. |
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| Who we are | |
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| Who is providing this notice? | InterOcean Capital Group, LLC |
| What we do | |
| How does InterOcean Capital Group, LLC 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 InterOcean Capital Group, LLC collect my personal information? | <p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> • Establish an investment advisory relationship • Contract for financial planning services • Open an account or deposit money with custodians • Purchase or sell securities with an executing broker-dealer <p>We also collect your personal information from other companies.</p> |
| 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"> ■ <i>Our affiliates include Focus Operating, LLC Focus Treasury & Credit Solutions, LLC, and Focus Risk Solutions, LLC.</i> |
| Nonaffiliates | <p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> ■ <i>InterOcean Capital Group, LLC does not share with nonaffiliates so they can market to you.</i> |
| 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"> ■ <i>InterOcean Capital Group, LLC does not jointly market.</i> |
| Other important information | |
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