

PLEASE RETAIN FOR YOUR RECORDS  
**ICA, LLC\* PRIVACY POLICY AND CONTACT INFORMATION**

ICA, LLC, recognizes that its customers have an expectation that ICA, LLC, and its affiliates will maintain the confidentiality of customers' nonpublic personal information. As a result, ICA, LLC, has adopted this Privacy Policy concerning information that you provide and that is obtained in servicing your account.

Information about you is collected for purposes of administering your account or accounts with us. We collect information about you for specific business purposes and not for resale or transfer to unaffiliated parties. The information we collect, the source of the information and the purposes it is used for are explained below. If you close your account or it becomes inactive, ICA, LLC, will adhere to the privacy policies and practices described in this notice.

### **INFORMATION COLLECTED**

Nonpublic information is collected and retained by ICA, LLC, for purposes of administering your account. It is not furnished to third parties for any purpose other than to administer the account. The information we collect can be summarized as follows:

1. *Account Establishment Information.* This is information furnished by you on forms creating your account with ICA, LLC, and its affiliated companies. Examples include your name and address, birth date, Social Security number, assets and income, and beneficiary designations (if applicable).
2. *Account Transaction Information.* This includes information obtained from you and the various entities that sponsor or comprise the assets in your account. It includes correspondence and phone contacts with us concerning the account, account assets, our services, as well as trading history and balances in the account. If the account includes assets or positions that were transferred from another financial institution, it may also include records from that institution.

### **NONPUBLIC INFORMATION THAT IS DISCLOSED**

All information regarding you and your account may be disclosed to any person or entity you have authorized pursuant to your account establishment documents. In addition, information may be disclosed to affiliated or nonaffiliated third parties to further your goals in establishing an account with ICA, LLC. Categories of information that are disclosed are as follows:

1. *Identifying Information.* Examples of this information include your name, address and Social Security or tax identification number.
2. *Transaction Information.* Examples include your directives to purchase or sell an asset in your account and the receipt of income to the account or distributions from the account.

### **PARTIES TO WHOM WE MAY DISCLOSE NONPUBLIC INFORMATION**

ICA, LLC, may disclose both identification and transaction information to affiliated and nonaffiliated parties for the following reasons:

1. *Financial Service Providers.* Examples are brokers, escrow agents, transfer agents, mutual fund companies or other representatives of the seller or purchaser of the asset or a firm that provides valuations for securities.
2. *Non-financial Companies.* Examples are companies that mail reports and prospectuses to you, statement printers, tax form providers, and government agencies and law enforcement officials (for example for tax reporting or under court order).

ICA, LLC, restricts access to your information to those who require such access in order to provide products and services to you, and does not disclose nonpublic personal information about our clients to any party, except as permitted by law.

### **HOW ICA, LLC, PROTECTS THE CONFIDENTIALITY OF YOUR NONPUBLIC PERSONAL INFORMATION**

ICA, LLC, and its affiliates value the trust you place in us. To maintain that trust, we have put into place safeguards to protect the privacy of your nonpublic personal information. We do not sell or trade your information with nonaffiliated companies.

Internally, ICA, LLC, employees are advised of ICA, LLC's, privacy policies and of the confidential nature of the information that they handle. Employees are advised they are to access only that customer information which is necessary to perform their job functions.

\*For purposes of this notice, "ICA, LLC," includes REIT Investment Group and Iroquois Capital Group, LLC, all whom are located at 102 Woodmont Blvd., Suite 130, Nashville, Tennessee 37205. If you have any questions, concerns, or want to limit our sharing please call our Chief Compliance Officer at (615) 467-7609.