



PRIVACY NOTICE FOR CUSTOMERS OF SMITH AFFILIATED CAPITAL CORP.

WHAT DOES SMITH AFFILIATED CAPITAL CORP. DO WITH YOUR PERSONAL INFORMATION?

Financial companies choose how they share your personal information. Federal law gives clients 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. Smith Affiliated Capital Corp. (“SAC”) does not disclose nonpublic personal information about our clients or former clients to third parties, except as described below.

Personal information we collect

We collect personal information about you in connection with providing investment advisory services. This information includes your Social Security number and may include other information such as your:

- Assets
- Investment experience
- Transaction history
- Income
- Account numbers
- Wire transfer instructions
- Other information provided during onboarding or account reviews

Certain information, such as Social Security numbers and account credentials, is considered sensitive and is subject to enhanced protections.

How we collect this information

We collect personal information from you when you:

- Enter into an investment advisory agreement
- Provide account or contact information
- Communicate with us

We may also receive information from third parties with whom you have authorized relationships, such as custodians, brokers, or account administrators.

How we use this information

SAC uses the personal information we collect for our everyday business purposes, including:

- Providing investment advisory services
- Communicating with you and your custodian
- Assisting in facilitating transactions through your custodian
- Responding to legal or regulatory requirements

SAC does not sell client personal information.

Disclosure to others

We may disclose your personal information as necessary to service your account, including to:

- Custodians
- Brokers
- Account administrators

These parties are authorized to use your information only as necessary to provide services related to your account and are required to maintain its confidentiality. We do not share your personal information with non-affiliated third parties for their independent marketing purposes.

How we protect your personal information

To protect your personal information from unauthorized access and use, SAC maintains administrative, technical, and physical safeguards consistent with federal requirements. These safeguards include secure systems, restricted access, and monitoring controls. SAC also maintains an Incident Response Program designed to detect, investigate, and respond to potential security incidents.

Your right to notification

If there were unauthorized access to certain sensitive personal information, SAC will notify affected clients in accordance with applicable law.

Additional Information for California Residents

This section applies only to California residents.

SAC is a financial institution subject to federal privacy laws, including the Gramm-Leach-Bliley Act (“GLBA”). Personal information we collect in connection with providing financial products or services is generally exempt from certain provisions of the California Consumer Privacy Act (“CCPA”).

SAC does not sell personal information.

We limit the collection, use, and sharing of personal information to what is necessary to provide our advisory services and to comply with legal and regulatory obligations.

California residents may contact us using the information below with any questions regarding their personal information.

Changes to This Privacy Notice

If we make material changes to this Privacy Notice, we will notify you as required by applicable law.

Who is providing this Privacy Notice

This Privacy Notice applies to:

- **Smith Affiliated Capital Corp.**

Whom to contact with questions

If you have any questions about this Privacy Notice, please contact us at:

- **Mail:** 45 Broadway, Suite 210, New York, NY 10006
- **Telephone:** 212-644-9440
- **Email:** info@smithcapital.com