



PRIVACY POLICY

Firethorn Capital, LLC considers all data obtained from its investors and prospective investors to be private and confidential and holds itself to the highest standards of trust in their safekeeping and use.

Firethorn receives nonpublic personal information about investors and prospective clients from applications or other forms and from reports on transactions under its programs with Firethorn's affiliates, financial service providers, or others. Firethorn does not disclose any nonpublic personal information about investors, former investors or prospective clients with any other party unless (1) it receives prior written consent, (2) Firethorn believes the recipient to be the individual the information pertains to or an authorized representative of that individual, (3) the recipient is a financial service provider who requires that information to provide products or services to the investor under Firethorn programs, or (4) Firethorn is required by law to release information to the recipient.

Firethorn restricts access to nonpublic personal information about investors, former investors, and prospective clients to those employees who need to know that information to provide products or services under Firethorn programs. Firethorn advises clients of its privacy policy when accounts are established and annually thereafter.