OPIMA CAPITAL MANAGEMENT

Privacy Notice

Facts	**WHAT DOES OPIMA CAPITAL MANAGEMENT ("OCM") DO WITH YOUR PERSONAL INFORMATION?**
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?	The types of personal information we collect, and share depend on the product or service you have with us. This information can include: • Name, date of birth, driver's license information, age, address, and Social Security number • Income, account balances and debt • Financial goals, spending habits and other information related to your financial condition
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 we choose to share; and whether you can limit this sharing.

Reasons we can share your personal information	Do we share?	Can you limit this sharing?
For our everyday business purposes - such as to process your transactions, maintain your accounts(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	Not Applicable
For our affiliates' everyday business purposes – information about your transactions and experiences	Yes	No
For our affiliates to market to you	No	Not Applicable
For non-affiliates to market to you	No	Not Applicable

To limit our sharing	**Please note**: If you are a new customer, we can begin sharing your information from the date you received this notice. When you are no longer our customer, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.
Questions?	Call (407) 612-7602

09/16/2026

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Who we are	
Who is providing this notice?	OPIMA CAPITAL MANAGEMENT ("OCM")
What we do	
How does OCM 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, secured files, and buildings.
How does OCM collect my personal information?	We collect your personal information, for example, when you ● Open an account
Why can't I limit all sharing?	Federal law gives you the right to limit only. ● Sharing for affiliates' everyday business purposes—information about your creditworthiness ● Affiliates from using your information to market to you. ● Sharing for non-affiliates to market to you State laws and individual companies may give you additional rights to limit sharing.
What happens when I limit sharing for an account I hold jointly?	Your choices will apply to everyone on your account—unless you tell us otherwise.
Your Rights	
Right to Access Information/Correct Inaccurate Information	You have the right to request access to information collected about you and information regarding the purposes for which we collect it and the third parties and service providers with which we share it. Additionally, you have the right to correct inaccurate or incomplete information. You may submit such a request as described below.
Right to Deletion of Information	You have the right to request in certain circumstances that we delete any information that we have collected directly from you. You may submit such a request as described below. We may have a reason under the law why we do not have to comply with your request or why we may comply in a more limited way than you anticipated. If we do, we will explain that to you in our response.
Right to Opt Out of Sale of Information to Third Parties	You have the right to opt out of any sale of your information by us to third parties by submitting a request. **We do not, however, sell information to third parties for their own direct marketing purposes.**
Right to Opt Out of Targeted Advertising	You have the right to opt out of targeted advertising based on your information obtained from your activities over time and across websites or applications. **We do not, however, utilize targeted advertising.**
Right to Opt Out of Profiling	You have the right to opt out of having your information processed for the purpose of profiling in the furtherance of decisions that produce legal or similarly significant effects concerning you. We do not, however, utilize profiling for these reasons.
Right to Appeal	If we decline to take action in any request that you submit in connection with the rights described in the above sections, you may ask that we reconsider our response by sending an email to the same email box (referenced in section below) from which you receive the decision. You must ask us to reconsider our decision within 45 days after we send you our decision.
Definitions	
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies.

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Non-affiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies.
Joint marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

Mail-in this section			
If you have a joint account, your choice(s) will apply to everyone on your account unless you mark below. • Apply only to me	Mark any you want to limit: • Do not allow your affiliates to use my personal information to market to me.		
	Name		Mail to: 2700 OLD WINTER GARDEN ROAD OCOEE, FL 34761
	Address		
	Phone Number		