

BNY Mellon Capital Markets, LLC

October 2008

Protecting Your Privacy

This notice applies to individuals who obtain or apply for a financial product or service for personal, family, or household purposes, or have done so in the past, from BNY Mellon Capital Markets, LLC.* It describes our policies and practices for collecting, disclosing, and safeguarding “nonpublic personal information,” which may include financial or other customer information. ***This Privacy Policy applies to our consumers who are retail customers and former retail customers. It does not apply to any of our affiliates or any other business line, nor does it apply to our non-retail customers.***

This notice replaces all previous notices of our consumer privacy policy, and may be amended at any time. We'll keep you informed of changes as required by law.

INFORMATION WE COLLECT AND SHARE

We collect a variety of nonpublic personal information about you, which may include:

- Information we receive from you, as provided, for example, on applications or other forms.
- Information about your transactions with us, our affiliates, and others. (Our affiliates include financial service providers such as banks, securities broker-dealers, broker-dealer clearing firms, investment advisors, asset management firms, insurance agencies, and transfer agents.)
- Other information we receive from affiliates and nonaffiliated third parties, including credit reporting agencies.

We disclose this information only as required or permitted by law. For example, we may share information with affiliates or nonaffiliated third parties that provide services to us, in order to process your transactions and service your accounts. We may also share information with those who perform marketing services on our behalf, or financial institutions with whom we have joint marketing agreements that provide for the confidentiality and security of customer information. When necessary, we also disclose customer information to regulatory agencies, law enforcement agencies, courts, or parties to lawsuits.

CONFIDENTIALITY AND SECURITY OF NONPUBLIC PERSONAL INFORMATION

We are careful to restrict access to your nonpublic personal information. Our employees, and in certain cases nonaffiliated third parties, have limited access to customer information based on their responsibilities. This access enables them to assist you in completing transactions, offer you additional financial services, and resolve any customer service issues that may arise. All employees are instructed to follow the confidentiality guidelines provided in our Code of Conduct, which is strictly enforced. We maintain physical, electronic, and procedural safeguards that comply with federal standards to safeguard nonpublic personal information.

*BNY Mellon Capital Markets, LLC. (“BNYMCM”), a wholly owned, indirect non-bank subsidiary of The Bank of New York Mellon Corporation, is a separate brokerage affiliate of The Bank of New York Mellon and BNY Mellon, N.A., and a member of FINRA and the Securities Investor Protection Corporation (“SIPC”). SIPC protects securities customers of its members up to \$500,000 (including \$100,000 for claims for cash). You may obtain information about SIPC, including the SIPC brochure, by contacting SIPC at <http://www.sipc.org/> or by writing to Securities Investor Protection Corporation, 805 15th Street, N.W. Suite 800, Washington, D.C. 20005-2215, or by calling at Tel: (202)371-8300. SIPC's facsimile number is (202)371-6728 and their email is: asksipc@sipc.org. Securities purchased from BNYMCM are not FDIC insured, are not deposits or other obligations of and are not guaranteed by BNYMCM, and involve investment risk, including possible loss of principal. The Bank of New York Mellon, BNY Mellon, N.A. and their affiliates may lend and provide other products and services to securities issuers and others, and provide and receive related fees and compensation.



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