

INVESTOR DISCLOSURES and PRIVACY POLICY

What is our commitment to you?

The following describes our Privacy Policy. Please take a moment to review it and feel free to contact us with any questions.

What types of non-public personal information do we collect about you?

In the course of providing service to you, we collect non-public personal information about you from the following sources:

- Information from you on account applications and other standard forms (for example, name, address, social security number, assets, types and amounts of investments, transactions, and income);
- Information about your transactions, our affiliates or others including those companies that work closely with us to provide you with diverse financial products and services (for example, your account balance, payment history, parties to transactions, types and amounts of investments, transactions, and credit card usage);
- Information we receive from consumer reporting agencies (for example, your credit worthiness and credit history);
- Information obtained when verifying the information you provide on applications or other forms (this may be obtained from your current or past employers, or from other institutions where you conduct financial transactions).

How do we protect the confidentiality and security of your non-public personal information?

Keeping your information secure is one of our most important responsibilities. We restrict access to non-public personal information about you to those employees and agents who need to know that information in order to provide products or services to you. We maintain physical, electronic, and procedural safeguards that comply with federal standards to guard your non-public personal information.

Do we disclose to any non-affiliated third parties your non-public personal information?

We do not sell, share or disclose your non-public personal information to non-affiliated third-party marketing companies. These disclosures are made in accordance with applicable federal privacy laws, including Regulation S-P, and only to the extent permitted by law.

When may we disclose non-public personal information?

We may disclose the information we collect, as described above to companies that perform marketing or other services on our behalf, or to other financial institutions with whom we have joint marketing agreements. These companies are contractually obligated to keep the information we provide to them confidential and use the information only for the services required and as allowed by applicable law or regulation and are not permitted to share or use the information for any other purpose.

We may also disclose non-public personal information about you under circumstances as permitted or required by law. These disclosures typically include information to process transactions on your behalf, to conduct operations, to follow your instructions as authorized, or to protect the security of financial records.

Do we disclose within our family of affiliated companies your non-public personal information?

While providing services to you, we are permitted by law to share within our family of affiliated

companies, information about our transactions or experiences with you (such as account balance or payment history).

What is our policy relating to former customers?

If you decide to close your account(s) or become an inactive customer, we will adhere to the privacy policies and practices as described in this notice.

We reserve the right to change this policy at any time and you will be notified if any changes occur.

If you have any questions after reading this Privacy Policy, please contact us in writing to Privacy Officer, WestPark Capital, Inc., 1800 Century Park East, Suite 220, Los Angeles, CA 90067.

This Privacy Policy applies to consumers who are customers or former customers of WestPark Capital, Inc. and its affiliated companies in the United States. Our affiliated companies include WestPark Capital, Inc., a SEC Registered Investment Adviser, and WestPark Insurance Services, Inc.

BUSINESS CONTINUITY PLAN SUMMARY

WestPark Capital Inc.'s policy is to respond to a Significant Business Disruption (SBD) by safeguarding our property and the lives of our employees, by making the appropriate assessments to ensure that we can complete the following:

- Resume operations,
- Protect all of WestPark Capital's books and records,
- Allow our customers to continue to conduct business, and
- Allow customers prompt access to funds and securities.

Significant Business Disruptions (SBDs)

Our plan anticipates internal and external disruptions. Internal disruptions affect only our ability to communicate and conduct business, such as a power outage or fire. External disruptions may prevent the operation of the securities markets, such as an earthquake, terrorist attack or widespread disruption. Our response to an external disruption relies more heavily on other organizations and systems including our clearing firm.

Our clearing firm is AXOS Clearing, LLC, 15950 W. Dodge Road #300, Omaha, NE 68118. Telephone: (402) 384-6100 or (800) 811-3487.

Office Locations

WestPark Capital has Offices of Supervisory Jurisdiction located in Los Angeles, CA, Irvine, CA, Westlake Village, CA, New York, NY, and Boca Raton, FL.

Corporate Headquarters – Los Angeles, CA

Our Los Angeles Office is located at 1800 Century Park East, Ste. 220. Its main telephone number is (310) 843-9300. Our employees may travel to that office by means of foot, car, train, bus, and plane. We engage in order taking and entry as well as other general securities business at this location.

New York, NY

Our New York Office is located at 535 Fifth Ave. 22nd Floor, New York, NY 10017. Its main telephone number is (347) 429-8380. Our employees may travel to that office by means of foot, car, train, bus, and plane. We engage in order taking and general securities business at this location.

Boca Raton, FL

Our Boca Raton Office is located at 225 NE Mizner Boulevard, Suite 530. Its main telephone number is (561) 427-2424. Our employees may travel to that office by means of foot, car, subway, train, bus, boat, and plane. We engage in order taking and entry as well as other general securities business at this location.

Irvine, CA

Our Irvine Office is located at 2030 Main Street, Suite 210, Irvine, CA 92614. Our main telephone number is 949-590-4200. Our employees may travel to that office by means of foot, car, train, bus, and plane. We engage in order taking and general securities business at this location.

WestLake Village, CA

Our Westlake office is located at 31194 La Baya Drive, Suite 101, Westlake Village, CA 91362. Our main telephone number is 805-449-8700. Our employees may travel to that office by means of foot, car, train, bus, and plane. We engage in order taking and general securities business at this location.

Customers' Access to Funds and Securities

The Firm does not maintain custody of customers' funds or securities. Customer funds and securities are carried by our clearing firm, AXOS Clearing, LLC. In the event of an internal or external SBD, if telephone service is available, our registered persons will take customer orders or instructions and contact our clearing firm on their behalf, and if our Web access is available, we will post on our website notification so customers may access their funds and securities by contacting AXOS Clearing at (402) 384-6100 or (800) 811-3487.

Data Back-Up and Recovery (Hard Copy and Electronic)

WestPark Capital maintains its primary hard copy books and records and its electronic records at our main office located at 1800 Century Park East, Suite 220, Los Angeles, CA 90067. The Designated Principal is responsible for the maintenance of these books and records. WestPark Capital maintains hard copies of books and records and electronic records are maintained at our clearing firm.

WestPark Capital maintains its back-up electronically on the cloud.

In addition, WestPark Capital also backs up the information onto portable hard drives. These hard drives are stored at a separate location.

In the event of an internal or external SBD that causes the loss of our paper records, we can physically recover them from our back-up. If our primary site is inoperable, we will continue operations from our back-up site or an alternate location. For the loss of electronic records, we can either physically recover the storage media or electronically recover data from our back-up site, or, if our primary site is inoperable, continue operations from our back-up site or an alternate location.

Order Taking

Currently, WestPark Capital receives orders from customers via telephone as well as through in person visits by the customer. During an SBD, either internal or external, we will allow customers to call in orders

themselves. Of these methods that are available and reliable, and in addition, as communications permit, we will inform our customers when communications become available to tell them what alternatives they have to send their orders to us. Customers will be informed of alternatives via telephone. If necessary, we will advise our customers to place orders directly with AXOS at (866) 774-0218.

Other Services Currently Provided to Customers

In addition to those services listed above, we also receive requests for account journals of securities, monies and stock certificates, stock certificates received and mailed out, change of address, and overall customer service. In the event of an internal SBD, we request all customers to contact AXOS Clearing, LLC directly at

(402) 384-6100 or (800) 811-3487. In the event of an external SBD, we would document all requests and forward to our clearing firm via the best available means. If none are available, we will notify customers of the delay, then forward to our clearing firm as soon as possible.

INVESTOR EDUCATION AND PROTECTION

Under the Public Disclosure Program, the FINRA provides certain information regarding the disciplinary history of FINRA members and their associated persons in response to written inquiries, electronic inquiries or telephone inquiries via FINRA Regulation's toll-free telephone number (800) 289-9999 or by accessing <https://brokercheck.finra.org>. Additional information, including a brochure describing the Public Disclosure Program, may be obtained from the FINRA Regulation Website at www.finra.org.

INVESTOR COMPLAINT REGISTRATION

Investors may contact the Firm directly for any matter, including the filing of a complaint by contacting the office of the Chief Compliance Officer, 1800 Century Park East, Suite 220, Los Angeles, CA 90067, or via telephone at (310) 843-9300.

IDENTITY THEFT PREVENTION PLAN (ITPP)

The Firm maintains an Identity Theft Prevention Plan ("ITPP") that is intended to protect our clients and their accounts from identity theft and to comply with the FTC's Red Flags Rule. The ITPP addresses identification of relevant identity theft Red Flags for our Firm, detecting those Red Flags, responding appropriately to any that are detected to prevent and mitigate identity theft.

To identify relevant identity theft Red Flags, our Firm assessed these risk factors:

- the types of covered accounts introduced to our clearing firm,
- the methods provided to open or access these accounts, and
- our clearing firm's previous experience with identity theft.

Our Firm also considered the sources of Red Flags, including identity theft incidents our clearing firm has experienced and how they changed identity theft techniques as they became aware of new risks, and applicable supervisory guidance of both our Firm and our clearing firm.

In addition to developing responses to Red Flags once they are identified, our Firm has also taken proactive measures to mitigate the likelihood of identity theft. Some of those proactive measures may include, but are not necessarily limited to, the following:

- Securing front-end system access,
- Physical and logical access controls,
- Secured vendor key-locked on-site shredding bins,
- Disposal of decommissioned electronic media, and
- Internal education to our staff and associated persons.

The Firm also provides for on-going associate education and training and oversight of vendors who may receive confidential information.

The Firm's ITPP is subject to continual change as we assess the ongoing needs of our clients and changing business environment in which we operate. The Firm's ITPP is periodically reviewed by Management. Questions regarding the Firm's ITPP may be directed to our AML/ITPP Compliance Officer at WestPark Capital, Inc., 1800 Century Park East, Suite 220, Los Angeles, CA 90067 or via telephone at (310) 843-9300.

ANTI-MONEY LAUNDERING (AML) DISCLOSURE

The USA PATRIOT Act, implemented in October 2002, is designed to detect, deter, and punish terrorists in the United States and abroad. The Act imposes new anti-money laundering requirements on brokerage firms and financial institutions. WestPark Capital, Inc. has implemented its AML program. To help you understand these efforts, we want to provide you with some information about money laundering and our steps to implement the USA PATRIOT Act.

What is money laundering?

Money laundering is the process of disguising illegally obtained money so that the funds appear to come from legitimate sources or activities. Money laundering occurs in connection with a wide variety of crimes, including illegal arms sales, drug trafficking, robbery, fraud, racketeering, securities fraud and terrorism.

What are we required to do to eliminate money laundering?

Under the rules required by the USA PATRIOT Act, our firm has designated an AML Compliance Officer, set up employee training, arranged for independent audits, coordinate activities with our clearing firm, AXOS Clearing, LLC and established policies and procedures to detect and report suspicious transactions and ensure compliance with the laws. As part of our required program, you will be asked to provide various identification documents. Until you provide the information or documents and until your identity has been verified, you may not be able to open an account or effect any transactions through us or our clearing firm.