



PRIVACY POLICY

ClearCreek Securities, LLC (“ClearCreek” or the “Firm”) recognizes and embraces the importance of keeping our customers’ confidential financial information private. Federal legislation requires us to notify our customers of our privacy practices by describing the types of non-public information we may collect in the ordinary course of business, and explain the ways that we protect their privacy.

- We will safeguard, according to strict standards of security and confidentiality, nonpublic, personal information our customers share with us. “Nonpublic, personal information,” for example, would include such information as your home address, social security number and credit information. We will maintain safeguards to protect that information and conduct our business in a manner that keeps personal customer information secure.
- We will limit the collection and use of customer information to the minimum we require to deliver exceptional service and to administer our business, recognizing, however, that we may need to obtain confidential information to provide financial advisory work and to conduct appropriate due diligence in our investment banking business.

We collect personal information from customers from the following sources:

- From customers on engagement letters, related agreements, and in the course of our examination of your business and prospects;
- From your transactions with us, our affiliates and others;
- From non-affiliated third parties in the course of our due diligence.

We restrict access to non-public personal information to ClearCreek’s employees and agents who need to know this information to provide products or services to you. It is our policy that we will not share personal customer information (of either current or former customers) outside of ClearCreek for any purpose other than the providing of investment banking services or the brokering or underwriting of securities transactions on behalf of the customer, unless the disclosure has been authorized by the customer or is permitted by law. Whenever we retain other organizations to provide support services on behalf of ClearCreek we will require them to protect customers’ personal information.

When necessary, we will review and revise our Privacy Policy to protect personal customer information.