

PRIVACY POLICY

Aldor Capital LLC
Registered Investment Adviser

Effective Date: March 30, 2026

Rev. March 30, 2026

Our Commitment to Your Privacy

Aldor Capital LLC (“Aldor Capital,” “the Firm,” “we,” “our,” or “us”) is committed to safeguarding the confidential information of our clients. We hold all personal information provided to us in the strictest confidence. This Privacy Policy describes how we collect, use, and protect your nonpublic personal information (“NPI”) in accordance with Regulation S-P (17 CFR Part 248) and applicable state privacy laws.

Information We Collect

We collect nonpublic personal information about you from the following sources:

- Information you provide to us directly, such as on applications, intake questionnaires, financial planning forms, and other documents
- Information about your transactions with us, our affiliates, or others, such as account balances, payment history, and investment activity
- Information we receive from third parties, such as your custodian, accountant, attorney, or other financial professionals with whom we coordinate on your behalf
- Information from consumer reporting agencies, if applicable

Information We Disclose

We do not sell your personal information to anyone. We do not disclose your nonpublic personal information to non-affiliated third parties except as permitted or required by law. Permitted disclosures include:

- To companies that perform services on our behalf, such as our custodian, technology providers, and compliance consultants, to the extent necessary for them to provide services to us and to you
- To your other professional advisors (CPA, attorney, insurance agent) when you have authorized us to coordinate with them
- As required by law, regulation, or legal process, such as in response to a court order, subpoena, or regulatory inquiry
- To protect against fraud or unauthorized transactions
- With your written consent

We require all third-party service providers who receive your NPI to maintain the confidentiality and security of that information and to use it only for the purpose for which it was disclosed.

Former Clients

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

How We Protect Your Information

We maintain physical, electronic, and procedural safeguards to protect your nonpublic personal information. These safeguards include:

Physical Safeguards

- Locked storage for physical documents containing client information
- Restricted access to offices and work areas where client information is accessible
- Secure destruction (shredding) of documents containing client information when no longer needed

Electronic Safeguards

- Encrypted storage and transmission of electronic client data
- Password-protected access to all systems containing client information
- Two-factor authentication on all systems accessing client data
- Firewalls and anti-malware software on all devices
- Regular software updates and security patches
- Encrypted email for communications containing sensitive client information
- Secure cloud storage with enterprise-grade encryption

Procedural Safeguards

- Access to client information is limited to persons who need it to provide services to you
- All supervised persons receive training on information security and privacy protection
- Annual review of information security practices and policies
- Incident response procedures for data breaches, including timely notification to affected clients

How We Use Your Information

We use your nonpublic personal information to:

- Provide financial planning and investment advisory services tailored to your needs
- Process transactions and maintain your account(s)
- Communicate with you about your account, financial plan, and our services
- Comply with legal, regulatory, and reporting obligations
- Detect and prevent fraud or unauthorized activity

Your Rights

You may request access to the personal information we maintain about you. You may also request that we correct any inaccurate information. To make such a request, please contact us at the address, phone number, or email listed below.

Changes to This Policy

We reserve the right to modify this Privacy Policy at any time. If we make material changes, we will notify you by delivering an updated copy of this policy. We will provide you with a copy of this Privacy Policy annually.

Contact Information

If you have questions about this Privacy Policy or our privacy practices, please contact:

Angel Santiago, Chief Compliance Officer

Aldor Capital LLC

[ADDRESS]

[PHONE] | [EMAIL]