



COLONY CAPITAL MANAGEMENT
AN ATLANTIC INVESTMENT COMPANY

Pointer Capital, LLC

Privacy Procedures & Policy

PRIVACY/REGULATION S-P

The Securities and Exchange Commission adopted Regulation S-P to comply with Section 504 of the Gramm-Leach-Bliley Act. Section 504 requires the Commission and other federal agencies to adopt rules implementing notice requirements and restrictions on a financial institution's ability to disclose non-public personally identifiable information about consumers. Under the Gramm-Leach-Bliley Act, a financial institution must provide clients with an initial and annual notice of its privacy policies and practices, and must not disclose non-public personal information about clients to non-affiliated third parties unless a variety of conditions are met. The Act also requires the Commission to establish appropriate standards to protect customer information.

Pointer considers the confidentiality, integrity and security of client information and records absolutely essential to maintain trust and superior service. To the extent Pointer collects certain nonpublic personally identifiable information about current and prospective clients, such information shall not be disclosed to any unauthorized individual or entity, except as permitted or required by law.

Pointer shall:

1. Maintain current policies and procedures to protect client records and information;
2. Deliver initially, and annually thereafter, privacy notices to all existing and new customers;
3. Provide all existing and new customers an opportunity to opt-out and cease the sharing of nonpublic personal information, if applicable;

Protect the collection, storage and transmission of all nonpublic personally identifiable

4. information; and,
5. Educate employees about privacy policy and procedures.

Pointer will disclose details of any information sharing arrangements. Specifically, Pointer shall disclose: the categories of nonpublic personally identifiable information that it may collect; the categories of nonpublic personally identifiable information it may disclose; the categories of affiliates and non-affiliate third parties to whom it discloses nonpublic personally identifiable information other than service providers that aid in fulfilling the service requested by a consumer; Pointer's policies with respect to sharing information about former customers; the categories of any information disclosed under agreements with third-party service providers and joint marketers and the categories of third parties providing the services, if any; a consumer's right to opt out of the disclosure of nonpublic personally identifiable information if information is shared with nonaffiliated third parties; and Pointer's policies and practices with respect to protecting the confidentiality, security, and integrity of nonpublic personally identifiable information.

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Pointer shall maintain physical, electronic and procedural safeguards to protect nonpublic personal information.

In some cases, a client may request that copies of reports be provided to a family member, attorney, accountant or other party. The client must complete an Authorization to Release Information to Named Parties or a substantially similar document before any information is provided to a third party.

Policy

Pointer Capital, LLC is committed to safeguarding the confidential information of our current and former clients. We hold all personal information in the strictest confidence. These records include all personal information that we collect from clients (or are authorized by the client to collect) in connection with the services we provide.

We will not disclose personal information to nonaffiliated third parties, except as permitted or required by law.

Our policy with respect to how we handle personal information about clients is outlined below.

How We Protect Client Information:

Employee access to personally identifiable client information is limited to those with a business reason to know such information. All employees are required to adhere to our privacy policy and make a signed statement agreeing to keep all personally identifiable information confidential during and beyond the term of their employment with Pointer Capital, LLC.

Personally identifiable information about a client will be maintained during the time he or she is a client, and at least for the time period thereafter that such records are required to be maintained by federal and/or state law. If we choose to dispose of such records after the required retention period, all documents containing personally identifiable information will be destroyed.

We maintain a secure office and computer environment to ensure that client information is not placed at unreasonable risk.

Any employee with access to client data using a smartphone is required to secure his or her smartphone with a pass code.

Disclosure of Information:

We will only provide nonpublic information to unaffiliated third parties as permitted or required by law, or with client expressed written or verbal consent.

For unaffiliated third parties that, as permitted by law, have access to client personal information, including financial service companies, consultants, auditors, or other service providers we may utilize to outsource operational or administrative procedures, we require strict confidentiality in our agreements with them and expect them to keep this information private. We do not provide client personally identifiable information to mailing list vendors or solicitors for any purpose.

FACTS**WHAT DOES Colony Capital, LLC
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:

- Social Security number and date of birth
- Account balances and holdings
- Transactions and settlement information

When you are *no longer* our customer, we continue to share your information as described in this notice.

How?

All financial companies need to share **client's** personal information to run their everyday business. In the section below, we list the reasons financial companies can share their **client's** personal information; the reasons **Colony Capital, LLC** chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Colony Capital share?	Can you limit this sharing?
For our everyday business purposes— such as to process your transactions, maintain your account(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	N/A
For our affiliates' everyday business purposes— information about your transactions and experiences	Yes	No
For our affiliates' everyday business purposes— information about your creditworthiness	No	N/A
For our affiliates to market to you	Yes	No
For nonaffiliates to market to you	No	N/A

Questions?

Call 404-365-5050 or go to www.colonycapital.com

Who we are

Who is providing this notice?

Colony Capital, LLC

What we do

How does **Colony Capital, LLC** 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 and secured files and buildings.

How does **Colony Capital, LLC** collect my personal information?

We collect your personal information, for example, when you

- contact us
- open an account
- enter into an investment advisory agreement with us

or provide information to us
or close 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 nonaffiliates to market to you

State laws and individual companies may give you additional rights to limit sharing.

Definitions

Affiliates

Companies related by common ownership or control. They can be financial and nonfinancial companies.

- Atlantic Investment Company, Pointer Capital, Five Stands, Atlantic Realty

Nonaffiliates

Companies not related by common ownership or control. They can be financial and nonfinancial companies.

- N/A

Joint marketing

A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

- N/A

Other important information