



# Hastings Capital Group

A MEMBER OF FINRA AND SIPC

## IMPORTANT NOTICES

### PRIVACY POLICY

Hastings Capital Group, LLC (the “Firm” or “we” or “us”) is committed to protecting the confidentiality and security of information we collect about our customers and potential customers (“you”). We will not share nonpublic information about you (“Information”) with third parties without your consent, except for the specific purposes described below or as permitted by law. The purpose of this notice is to tell you how we handle, protect and limit the use of the Information that we collect in order to service and administer your business with the Firm.

**Information We Collect:** We limit the collection and use of Information to the minimum we require to deliver superior service to you. Such service includes processing transactions requested by you and administering our business. We get most Information directly from you when you apply for, access and use financial products and services offered by the Firm and its affiliate, SkyBridge Capital II, LLC (“SkyBridge”), whether in person, by telephone or electronically. Such Information may include the following:

- Information received from you on subscription documents and other forms (for example, name, address, telephone numbers, email address, government-issued identification, social security numbers, bank account details, assets, income and the types and amounts of investments);
- Information we receive about you from other sources (for example, from a consumer reporting agency or public sources used to verify information regarding your finances, employment, avocations or other personal characteristics);
- Information about your transactions with us, our affiliates or others, such as participation in other investment programs, ownership of certain types of accounts or other account data and activity; and
- Information obtained from meetings, telephone conversations and other interactions with you.

**Disclosure of Information:** We do not disclose Information about our clients or former clients except as permitted by law, including disclosures made with your consent or as necessary to process and service your account, to protect against fraud, or to protect the security or confidentiality of our records. In addition, we may disclose Information to affiliated and non-affiliated third parties that provide services necessary to effect a transaction that you request or to service your account, such as prime brokers, accountants, auditors, banks, attorneys or administrators. Finally, we may be required to disclose Information to government agencies, courts, parties to lawsuits or regulators in response to subpoenas; in such cases, we share only the information that we are required or authorized to share. Except in those specific, limited situations, we will not make any disclosures of Information to other companies without your consent.

**Confidentiality and Security:** The security of your Information is our priority. We protect this Information by maintaining physical, electronic and procedural safeguards that comply with applicable laws and federal regulations. We train our employees in the proper handling of this Information. They may access your Information only when there is an appropriate reason to do so, such as to service and administer your business with the Firm. It is the Firm’s policy to require all third parties, other than SkyBridge, that are to receive any Information to sign strict confidentiality agreements. An individual investor’s right to privacy extends to all forms of contact with us, including telephone, written correspondence and electronic media, such as the Internet. These policies are strictly enforced.

**Former Customers:** If you terminate your relationship with the Firm, we will continue to adhere to this Privacy Policy.

**Further Information:** This notice replaces all previous statements of the Firm’s Privacy Policy, and may be amended at any time. We will provide you with annual reminders of our policies and with revised policies if there are any changes in how we handle your Information. The examples contained herein are illustrations and they are not intended to be exclusive. This notice complies with federal law and SEC regulations regarding privacy. You may have additional rights under other foreign or domestic laws that may apply to you.

### SPECIAL MEASURES FOR JURISDICTIONS, FINANCIAL INSTITUTIONS, OR INTERNATIONAL TRANSACTIONS OF PRIMARY MONEY LAUNDERING CONCERN

Pursuant to Section 311 of the USA PATRIOT Act, the Firm is prohibited from directly or indirectly opening or maintaining certain correspondent or payable-through accounts for or on behalf of a foreign banking institution if such correspondent or payable-through account involves certain jurisdictions or financial institutions. For a complete list of current prohibited jurisdictions and institutions, visit <https://www.fincen.gov/resources/advisoriesbulletinsfact-sheets>.

### CUSTOMER IDENTIFICATION PROGRAM NOTICE

To help the government fight the funding of terrorism and money laundering activities, federal law requires financial institutions to obtain, verify and record information that identifies each person who opens an account. This notice answers some questions about the Firm’s Customer Identification Program.

**Information We Collect:** When you open an account, the Firm is required to collect the following information:

- **For Individuals:** name, date of birth, residential address, Social Security or taxpayer identification number, government-issued identification number and related information (US driver's license number and residence; passport number, nationality and country of issuance; resident-alien identification number, nationality and residence; etc.). Individuals may also need to provide copies of government-issued photographic identification, passport, utility bill or other identifying documents.
- **For Entities:** principal place of business, local office, tax identification number. The entity (corporation, partnership, trust, etc.) may also need to provide copies of its organizational documents (articles of incorporation, government-issued business license, partnership or trust agreement, etc.) and information about its beneficial owners, control persons, trustees, etc. (see above).

U.S. Department of the Treasury, Securities and Exchange Commission, and FINRA rules already require you to provide most of this information. These rules also may require you to provide additional information, such as your net worth, annual income, occupation, employment information, investment experience and objectives and risk tolerance.

**What happens if I don't provide the information requested or my identity can't be verified?** The Firm may not be able to open an account or carry out transactions for you. If the Firm has already opened an account for you, we may have to close it. To help the government fight the funding of terrorism and money laundering activities, federal law requires financial institutions to obtain, verify, and record information that identifies each person who opens an account.

### **BUSINESS CONTINUITY DISCLOSURE**

The Firm has developed a Business Continuity Plan to ensure its preparedness and adaptability to respond to events that significantly disrupt our business operations. Summarized below, the Firm's Business Continuity Plan provides for variations in our response to an actual event since the timing, location, and impact of disasters and disruptions are unpredictable.

The Firm plans to quickly recover and resume business operations after a significant business disruption and respond by safeguarding our employees, associated persons and property; making a financial and operational assessment; protecting our Firm's books and records; and allowing us to transact business. In short, our Business Continuity Plan is designed to permit our Firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption. Our Business Continuity Plan addresses data back-up and recovery; all mission critical systems; financial and operational assessments; alternative communications with customers, employees, associated persons and regulators; alternate physical locations of employees; impact on critical suppliers, contractors, banks and counterparties; and regulatory reporting.

**Varying Disruptions:** Significant business disruptions can vary in their scope, such as only affecting 527 Madison Avenue, 4th Floor, New York, NY 10022 (our "Main Office"); a single building housing the Main Office; the business district where the Main Office is located; the city where the Main Office is located or the whole region where the Main Office is located. Within each of these areas, the severity of the disruption can also vary from minimal to severe. It is our Firm's practice to replicate our critical electronic data on a near real-time basis to each of two geographically separate locations, enabling us to recover records from the Main Office and in some cases through remote access. Backups are performed at least nightly, and additional monthly backup tapes are stored off-site. To ensure reliability, the Firm performs testing of the Firm's replication, backup and communication systems on a semi-annual basis at a minimum.

If a significant business disruption occurs to only our Main Office or a building housing our Main Office, we will transfer our operations to an alternate available local site(s) where we would expect to recover affected files and systems, and to resume normal business operations within hours of the disruption. In a disruption affecting our business district, city, or region, we will transfer our operations to an available alternate site(s), and recover and resume business as soon as our affected communication and other electronic systems are restored. The Firm estimates that it would take approximately one to two business days to resume normal business operations in the event of any such widespread disruption. In the event of a cybersecurity disruption, our Firm will consider the nature of the incident in determining the appropriate measures for relief and recovery. These measures may at a minimum include notifying our customers and regulators, and providing credit monitoring services for our customers. Should any type of widespread or significant business disruption occur, we plan to continue business operations and will notify you by telephone or other available communication means about how to contact us.

### **COMPLAINT REPORTING**

The Firm is available answer any questions or concerns that you may have. You may direct your complaints regarding the Firm and/or its representatives to Chief Compliance Officer Marie Noble at the contact information below.

### **CONTACT INFORMATION**

If you have questions about any of these notices, please contact Chief Compliance Officer Marie Noble at 527 Madison Avenue, 4th Floor, New York, NY 10022; telephone number (212) 485-3129; or [mnoble@skybridge.com](mailto:mnoble@skybridge.com). Additional information about Hastings and the investment products we offer through SkyBridge is available at <http://SkyBridge.com/Disclosures>.