



COMPLIANCE POLICIES & PROCEDURES

UPDATED JUNE 2022

Protecting Your Data

While we take the issue of data security very seriously, we require very little client-specific data to adequately service your firm and accounts. Because client assets are not held in custody with our firm and transactions are made on a DVP/Prime Broker basis, we require very little information to transact business. At most, we require a client's custodial account number (at Schwab, TDA, etc.) and either the title of the account or even simply a unique code by which we can identify the account in question. We do not require addresses, full names, tax ID numbers, or anything of that nature. By using the account numbers with account and household identifiers, it is possible for us to keep client information retained by us to a minimum, and in many cases, not even have to communicate PII via email, etc. In addition, and to the extent clients do need or wish to transmit PII, we send secure emails using the Smarsh Encryption Suite, and are able to use most encrypted file transmission systems our clients may establish.

Privacy Policy

The following is a description of Arkadios Capital, LLC's (Arkadios) policies regarding disclosure of nonpublic personal information that you provide to Arkadios or that Arkadios collects from other sources.

Categories of Information Arkadios Collects: Arkadios collects the following nonpublic personal information about you:

Information Arkadios receives from you on applications or their forms, correspondence, or conversations (such as your name, address, phone number, social security number and date of birth); and

Information about your transactions with Arkadios, their affiliates, or others (such as your account number and balance, payment history, parties to transactions, cost basis information, and other financial information).

Categories of Information Arkadios Discloses: Arkadios does not disclose any nonpublic personal information about their current or former clients or accounts to unaffiliated third parties, except as required or permitted by law. Arkadios is permitted by law to disclose all of the information they collect, as described above, to their service providers (such as the clearing firm) to process your transactions and otherwise provide services to you.

Confidentiality and Security: Arkadios restricts access to your nonpublic personal information to those persons who require such information to provide products or services to you. Arkadios maintains physical, electronic, and procedural safeguards that comply with federal standards to guard your nonpublic personal information.

Business Continuity Plan

The Arkadios Capital BCP can be found here: [Business Continuity Plan](#)

Disclosures

FINRA Broker Check: Broker Check provides information about current and former FINRA-registered Broker/Dealers as well as current and former registered representatives. Call: (800) 289-9999 <https://brokercheck.finra.org>

EMMA: EMMA is designated by the U. S. Securities and Exchange Commission as the official source for municipal securities data and disclosure documents. The website provides free public access to objective municipal market information and interactive tools for investors, municipal entities and others. <https://emma.msrb.org/>

Routing Practices Disclosure-Rule 606: SEC Rule 606 requires broker-dealers that route customer orders in equity and option securities to make publicly available quarterly reports that identify the venues to which customer orders are routed for execution. You may locate our quarterly report required under Rule 606 here: [SEC RULE 606 Reports](#)

SIPC: Arkadios Capital is a Member, FINRA, SIPC. For additional information on how SIPC protects you as an investor please see the SIPC Brochure at: <https://www.sipc.org/news-and-media/brochures>

Broker Dealer Information: To learn more about our broker dealer please visit www.arkadioscapital.com

Clearing Firm Information: Arkadios Capital clears its customer transactions, and also custodies its customer assets, with National Financial Services, Member NYSE, SIPC. Call: (800) 735-3756 Web Site: <https://clearingcustody.fidelity.com>

Partner Registration Information

Michael Belote – CRD#: [5642403](#)

Joe Patire – CRD#: [3073133](#)

Shane Carpenter – CRD#: [5034102](#)

Gary Schwartz – CRD#: [2691699](#)

Ross Nelson – CRD#: [4892307](#)

David Summers – CRD#: [2765527](#)

Full partner bios may be found at <https://spfg.com/about>