

**Vertimass, LLC & Shopoff Securities, Inc.
Privacy Policy 2023**

Protecting your privacy is our top priority. At Vertimass, LLC we understand our obligation to keep information about you secure and confidential. We will inform you of our policies for collecting, using, securing, and sharing personally identifiable and/or non-public personal information (“Customer Information”) the first time we do business and every year that you remain a customer with us. Therefore, we maintain the following principles with respect to protecting your privacy:

- We are committed to protecting your privacy at all times;
- We do not sell or disclose any non-public personal information about you to anyone except as permitted by law;
- We do not provide customer information to persons or organizations for their own marketing purposes outside the affiliated companies who are doing business on our behalf;
- We contractually require any person and/or organization providing products or services to customers on our behalf to protect the confidentiality of Vertimass, LLC and Shopoff Securities, Inc. customer information; and
- We afford prospective and former customers of Vertimass, LLC and Shopoff Securities, Inc. the same protections as existing customers with respect to the use of personal information.

What Personal Information Do We Collect?

We collect and use various types of information we believe is necessary to administer our business, and to offer you the best possible customer service. Customer information we collect is categorized into the following types:

- Information received in the subscription materials or other forms, through telephone or in-person interviews, such as your name, address, phone number, social security number or taxpayer identification number, assets, income and other household information;
- Information about your transactions and account experience with us and our affiliates, such as your account balance and transaction history;
- Information from consumer reporting agencies, such as information regarding your creditworthiness or credit history;
- Information from visitors to our website provided through online forms, site visitor data and online information collecting devices such as “cookies”; and
- Other general information we obtain about you that is not assembled for the purpose of opening an account or offering certain products or services that you may request, such as demographic information.

The above examples are a sample of the information collected and are not intended to be exclusive.

Is Personal Information Shared With Others?

We limit the sharing of information with others. We do not disseminate the information we collect about you to any non-affiliated third parties for marketing purposes. Therefore, clients will neither need to nor have the opportunity to opt out of the disclosure of non-public personal information.

Vertimass, LLC and Shopoff Securities, Inc. may share information with our affiliates, and employees and agents of Shopoff Securities, Inc. or its affiliates, or except as permitted or required by law. We may share the information we collect about you with non-affiliated service providers, for example, accounting firms that prepare tax reporting information, transfer agents, and banks that handle wire transfers and escrow investments.

Disclosing Information in Other Situations

We may also disclose any of the five types of Customer Information to credit bureaus and similar organizations, and otherwise when permitted by law. For example, this may include:

- A disclosure in connection with a subpoena or similar legal process;
- A fraud investigation;
- Recording of deeds of trust and mortgages in public records;
- An audit or examination; and
- The sale of your account to another financial institution.

How Do We Protect the Confidentiality, Security and Integrity of Information About You?

We are committed to preventing others from authorizing access to your customer information, and we maintain procedures and technology designed for this purpose. We take several steps to protect the customer information we have about you, including the following:

- We restrict access to information about you to those employees who need to know that information to provide you with the best possible products and services;
- Where third parties provide support services, we require them to conform to our privacy standards; and
- We maintain physical, electronic, and procedural safeguards that comply with federal standards to guard your non-public personal information.

Although we take these measures to protect your information, we are unable to guarantee non-public personal information may not be compromised through the Internet or by third parties.

Keeping Up to Date with our Privacy Policy

Vertimass, LLC and Shopoff Securities, Inc. will provide notice of our privacy policy annually as long as you maintain an ongoing relationship with us. If, at any time in the future, it is necessary to disclose any of your non-public personal information in a way that is inconsistent with this policy, we will give you advance notice of the proposed change so that you may have the opportunity to opt out of such disclosure.

We have procedures in place that help us to maintain the accuracy of the personally identifiable information that we collect. Please write to us or call us if you believe that our information about you is incomplete, out-of-date, or incorrect. Additionally, since this policy may change from time to time, you can always review our current policy by contacting us for a copy at (949) 417-4307 or by visiting our website at www.vertimass.com.

FINRA Public Disclosure Information

FINRA requires that we provide information concerning the FINRA 's Public Disclosure Program. The Program provides investors with important information about the professional background, business practices, and conduct of FINRA members and their associated persons. FINRA's Public Disclosure hotline number is (800) 289-9999. FINRA's web site address is www.finra.org. Investor brochures that include information describing public disclosure may be obtained from FINRA.

SIPC Disclosure

Shopoff Securities, Inc. is a member of the Securities Investor Protection Corporation ("SIPC"), which provides account protection for the net equity of a customer's funds and securities positions. SIPC provides \$500,000 of primary net equity protection, including \$250,000 for claims for cash ("SIPC Coverage"). Visit www.sipc.org for more information about SIPC Coverage. Account protection applies when a SIPC member firm fails financially and is unable to meet its obligations to its securities customers but does not apply to losses from the rise or fall in the market value of investments or to SIPC ineligible assets such as futures, foreign exchange transactions, or any investment contracts that are not registered as securities.