



PRIVACY POLICY

Our Commitment to our Clients

Lighthouse Capital Group, LLC (“LCG”) is a Broker-Dealer which supervises the securities transactions of JRW Investments, Inc. (“JRW”). Both LCG and JRW are committed to maintaining the trust and confidence of our clients. As a Broker-Dealer, LCG has a regulatory obligation to collect appropriate personal and financial information necessary for determining suitable investment strategies before transacting any business.

We believe it is important for our clients to understand how we protect the sensitive information that you provide to us. This document outlines the procedures and processes we have designed and implemented to guard your privacy as a part of our ongoing commitment to you.

- Both JRW and LCG NEVER sells your personal information to third parties for marketing or promotional purposes. JRW and LCG may collect personal information, such as names, address, email address, financial information, and contact details, when interacting with our website or services. This information is collected to enable us to provide and improve our services, personalize our client’s experience, and communicate with clients regarding their account and relevant updates; LCG will only use this data for these purposes and take appropriate measures to protect its security.
- LCG may use third party service providers for its internal and technological purposes (database management, server backup services, email archiving, etc.). Any third-party service providers that Lighthouse Capital Group may use will be contractually prohibited from disclosing any of the confidential information they access to anyone outside the scope of their services to LCG. Our vendors only have access to the information necessary to perform their particular service to LCG and its clients and are not permitted to use this information for any other purpose. NO mobile opt-in will be shared with third parties for marketing or promotional purposes.
- We will use the phone number and email address you provide to us in order to convey important administrative information to you.
- We train our staff to flag suspicious requests and activities that do not reflect the pattern of our past dealings with our clients. This helps our Firm to protect its clients by immediately identifying and reporting any attempts at fraud, phishing, or identity theft.

Disclosing Information in Other Situations

There is a very limited set of circumstances under which JRW or LCG may be legally required to disclose a client’s personal information to law enforcement, government regulators, or another applicable authority, or as mandated by court order. JRW or LCG may also disclose personal information to protect its rights or to enforce the contractual terms included in our Client Agreement. We may disclose certain client information to credit bureaus and similar organizations, or otherwise when permitted by law.

Information Security

We are committed to preventing unauthorized access to your information. In order to ensure that your data remains consistently protected, we have created a comprehensive data security program combining industry-leading electronic, physical, and procedural safeguards, including but not limited to the following best practices:

- We utilize hardware and software firewalls that limit internal network access to only the recognized physical machines that have been preauthorized;
- We lock all physical files in rooms that can only be accessed by authorized personnel during standard business operating hours;
- We restrict access to information about you to only those specific employees who require it;
- We require external vendors and independent contractors to enter into a confidentiality agreement before being granted access to any customer data. This data may be necessary to contact investors regarding educational seminars or client appreciation events, as well as for servicing or processing purposes. The confidentiality agreement prohibits the use of client information for any purpose other than the specified service(s) to be provided by each vendor;
- We update and test our technology on a regular basis to ensure consistency and to improve the protection of customer information; and,
- We create and implement internal procedures that limit access to customer information to only those members who are considered “authorized” personnel.

Policy Relating to Affiliate Companies:

Joshua Ungerecht and Warren Thomas, managing members of Lighthouse Capital Holdings, LLC, retain ownership in a number of affiliate companies: JRW Investments, Inc.; Altus Capital, LLC; Provident Realty Capital, LLC; JRW Research & Consulting, Inc.; ExchangeRight Real Estate, LLC; ExchangeRight Securities, LLC; Telos Capital, LLC; and JRW Realty, Inc. If a client decides to engage in a transaction offered by any of these affiliate companies, their information will be provided to the affiliate's authorized staff in facilitation of the client's request.

Policy Relating to Former Customers

If a client decides to close their account or become an inactive customer, the firm will adhere to the privacy policies and practices as described in this notice.

Right to Revision and Notice Policy

JRW Investments, Inc and Lighthouse Capital Group, LLC reserve the right to change this policy at any time. If we do choose to change this policy, we will notify all current and former clients affected by such changes.