

FACTS

WHAT DOES ISLAND CAPITAL GROUP 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: <ul style="list-style-type: none"> ▪ Social Security number ▪ Account balances, account transactions and transaction history ▪ Wire transfer instructions and investment experience
How?	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Island Capital Group LLC and its subsidiaries and affiliates, including its investment adviser and broker-dealer subsidiaries and affiliates (collectively, "ICG") chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does ICG 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	No	We do not share
For joint marketing with other financial companies	No	We do not share
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	We do not share
For our affiliates to market to you	Yes	Yes
For our nonaffiliates to market to you	No	We do not share

To limit our sharing	<p>Mail the form below</p> <p>Please note: If you are a <i>new</i> customer, we can begin sharing your information 30 days from the date we sent this notice. When you are <i>no longer</i> our customer, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.</p>
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Questions?	Call (212) 705-5090.
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Mail-in Form		
<p>If you have a joint account, your choice will apply to everyone unless you mark below.</p> <p><input type="checkbox"/> Apply my choices only to me</p>	<p>Mark any/all you want to limit:</p> <p><input type="checkbox"/> Do not allow your affiliates to use my personal information to market to me.</p>	
Name	<p>Mail to: Island Capital Group LLC Attn: Chief Compliance Officer 717 Fifth Avenue, 18th Floor New York, NY 10022</p>	
Address		
City, State, Zip		
Account #		

Who We Are

Who is providing this notice?	ICG
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What We Do

How does ICG 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 ICG collect my personal information?	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> ▪ Open an account ▪ Seek advice about your investments ▪ Provide account information ▪ Enter into an investment advisory contract ▪ Make a wire transfer <p>We also collect your personal information from others, such as affiliates or other companies.</p>
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> ▪ sharing with affiliates' everyday business purposes---information about your creditworthiness ▪ affiliates from using your information to market to you; and ▪ sharing for nonaffiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.</p>
What happens when I limit sharing for an account I hold jointly with someone else?	Your choices will apply to everyone on your account -- unless you tell us otherwise.

Definitions

Affiliates	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> ▪ <i>Our affiliates include companies with an Island name, such as Island Capital Group LLC and Island Investment Management LLC; financial companies such as Anubis Securities LLC, ICG Charge Me Directives LLC, MV ESC Directives LLC, C-III Capital Partners LLC, C-III Investment Management LLC, C-III SA Management LLC, C-III JERIT Manager LLC and JER Investors Trust Inc.; nonfinancial companies; and others, such as C-III Realty Services LLC (d/b/a NAI Global) and New America Network Inc.</i>
Nonaffiliates	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> ▪ Nonaffiliates we share with can include various service providers to assist in the administration of the investment funds and accounts advised by ICG and its subsidiaries and affiliates.
Joint marketing	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> ▪ <i>ICG does not jointly market.</i>

Other important information

NV: If you are a consumer with a Nevada mailing address, we are providing you this notice under state law. If you prefer not to receive marketing calls from us, you may be placed on our internal Do Not Call List by contacting us at 866-209-7628; privacy@c3cp.com; 717 Fifth Avenue, 18th Floor, New York, NY 10022. You may also contact the Nevada Attorney General's office: Bureau of Consumer Protection, Office of the Nevada Attorney General, 555 E. Washington St., Suite 3900, Las Vegas, NV 89101; telephone number: 1-702-486-3132; email BCPINFO@ag.state.nv.us or AgInfo@ag.nv.gov.

Who is providing this notice?

Island Capital Group LLC, Island Investment Management LLC, ICG Charge Me Directives LLC, MV ESC Directives LLC, Anubis Securities LLC, C-III Capital Partners LLC, C-III Investment Management LLC, C-III SA Management LLC, C-III JERIT Manager LLC, JER Investors Trust Inc., C-III Realty Services LLC (d/b/a NAI Global Capital Markets) and New America Network Inc.