

Privacy Notice	WHAT DOES PENN CAPITAL MANAGEMENT COMPANY, LLC (“PENN CAPITAL”) 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?	<p>The types of personal information Penn Capital collects and shares depend on the product(s) or service(s) you have with us. The information can include:</p> <ul style="list-style-type: none"> * Social Security number * Account balances and account transactions * Assets and transaction history <p>When you are no longer our client, Penn Capital continues to share your information as described in this Privacy Notice.</p>	
How?	All financial companies need to share personal information about clients to run their everyday business. In the section below, we list the reasons financial companies can share their clients' personal information; the reasons Penn Capital chooses to share; and whether you can limit this sharing.	
Reasons we can share your personal information	Does Penn Capital share?	Can you limit sharing?
For everyday business purposes - such as processing your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For marketing purposes - to offer our products and services to you	No	No
For joint marketing with other financial companies	No	No
For affiliates' everyday business purposes - information about transaction(s) and experiences	Yes	No
For affiliates' everyday business purposes - information about your creditworthiness	No	No
For nonaffiliates to market to you	No	No
Questions?	Call 215-302-1500, Email: ClientService@penncapital.com or “Contact Us” at www.penncapital.com	

Who we are	
Who is providing this notice?	Penn Capital Management Company, LLC
What we do	
How does Penn Capital 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 and safeguarded files and buildings. We also do not sell your personal information.
How does Penn Capital collect my personal information?	We collect your personal information, for example, when you <ul style="list-style-type: none"> * Open an account or deposit money * Provide information on client questionnaires
Why can't I limit all sharing?	Federal law gives you the right to limit only <ul style="list-style-type: none"> * sharing for affiliates everyday business purposes- information about your creditworthiness * affiliates from using your information to market to you * sharing for nonaffiliates to market to you State laws and individual companies may give you additional rights to limit sharing.
Online privacy	Should you opt to do so when you visit our websites, www.penncapital.com or www.penncapitalfunds.com , Penn Capital will use tracking cookies that can recognize previously known repeat users and track usage patterns to better serve your preferences when you return to our site. If you also opt to do so, we will use cookies or technology provided by our ad serving technology vendor(s) to help manage our online advertising and email marketing subscription(s) to you.
Definitions	
Affiliates	Our affiliates include companies with a common corporate identity of financial institution: <ul style="list-style-type: none"> * Seaport Global Securities LLC * Seaport Global Asset Management LLC
Nonaffiliates	Penn Capital does not share with nonaffiliates so they can market to you.
Joint marketing	Penn Capital does not jointly market.
Other important information	
Penn Capital offers its clients control over the personal information it collects about them. Depending on where you reside and subject to applicable law, including state consumer privacy laws such as those enacted in California, Colorado, Connecticut, Virginia, Utah, and other states that may adopt similar requirements, you may have additional privacy rights as described below. This section is intended to supplement, and not replace, the other parts of this Privacy Notice.	

For purposes of this section, “personal information” or “personal data” generally means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked to an identified or identifiable individual, subject to exemptions and exclusions under applicable law. This section does not apply to information that is exempt under federal or state law, including information subject to the Gramm-Leach-Bliley Act, Fair Credit Reporting Act, or other financial services, securities, tax, anti-money laundering, or recordkeeping requirements.

Categories, sources, purposes, and disclosures

- The categories of personal information we collect may include identifiers, contact information, account and financial information, transaction history, commercial information, internet or electronic network activity, communications with us, professional or business information, and other information you provide or that is generated through your relationship with us. We collect this information from you, your representatives, custodians, service providers, affiliates, counterparties, public sources, and other third parties you authorize. We use and disclose personal information to provide and administer services, communicate with you, verify identity, maintain and protect accounts, prevent fraud and illegal activity, comply with legal and regulatory obligations, improve our services, and for other purposes disclosed in this notice or permitted by law. We may disclose personal information to service providers, affiliates, custodians, professional advisers, regulators, law enforcement, transaction counterparties, and other third parties as necessary or required by law.

Retention of personal information

- We retain personal information for as long as reasonably necessary to provide services, manage our relationship with you, comply with legal and regulatory obligations, resolve disputes, maintain business records, enforce agreements, and protect against fraud, security incidents, or other misuse.

Right to know / access:

- You have the right to request confirmation of whether we process your personal information and to receive a copy of that personal information, together with an explanation of the categories of personal information we collect, the sources of that information, the purposes for which we use it, and the categories of third parties to whom we disclose it.

Right to correct inaccurate information:

- You have the right to request that we correct inaccurate personal information about you, considering the nature of the information and the purposes for which it is processed.

Right to delete (with necessary exceptions):

- You have the right to request that we delete your personal information, subject to important exceptions, such as where we need the information to:
 - Provide the services you have requested or manage and administer your account
 - Comply with legal or regulatory obligations (including securities, tax, AML, and recordkeeping requirements)
 - Establish, exercise, or defend legal claims or maintain necessary business records.

Right to data portability:

- You have the right to request that we provide certain personal information to you in a structured, commonly used, and machine-readable format, and to transmit that information to another controller where technically feasible and permitted by applicable law.

Right to limit use and disclosure of sensitive personal information:

- Where we process “sensitive” personal information as defined by applicable law, you have the right to request that we limit our use and disclosure of such information to what is necessary to provide the services you request, maintain your account, or meet our legal and regulatory obligations.
- Where applicable law requires consent to process sensitive personal information or sensitive personal data, we will obtain consent before processing such information unless an exception applies, including where the processing is necessary to provide services, protect accounts, prevent fraud, or comply with legal or regulatory obligations.

Right to restrict or object to certain processing:

- You have the right to object to or request restriction of our processing of your personal information in certain circumstances, such as where the processing is based on our legitimate interests or for certain direct marketing activities, and we will honor your request where required by law and where it does not prevent us from servicing your account or complying with our legal obligations.

Right to opt out of sale or sharing for targeted advertising:

- You have the right to direct us not to “sell” or “share” your personal information, as those terms are defined under applicable California law, including for cross-context behavioral advertising or certain targeted marketing activities.

- If we engage in targeted advertising, sales of personal information, or profiling that produces legal or similarly significant effects, you may have the right to opt out of those activities. Where required by law, we will also recognize valid universal opt-out preference signals, such as browser-based or device-based signals, for applicable opt-out rights.

Right regarding automated decision-making / profiling (if used):

- Where required by law, you have the right to request information about any automated decision-making or profiling that produces legal or similarly significant effects concerning you and, in some cases, to request human review of such decisions.

Right to withdraw consent (where processing is consent-based):

- Where we rely on your consent to process your personal information, you have the right to withdraw that consent at any time, without affecting the lawfulness of processing carried out before the withdrawal.

Right to non-discrimination / non-retaliation:

- You have the right not to receive discriminatory treatment for exercising any of your privacy rights, although we may provide different levels of service or pricing where reasonably related to the value of your personal information or as permitted by law.
- If you use an authorized agent to submit a request, we may require proof that you authorized the agent to act on your behalf and may also require you to verify your identity directly with us, unless otherwise prohibited by applicable law.

Right to lodge a complaint:

- You have the right to raise questions or complaints about how we process your personal information with us and, where applicable, with your local data protection authority or other regulator.

How to exercise your rights

- You may exercise these rights by submitting a request to Penn Capital at questions@penncapital.com. Your request should identify the right you wish to exercise and provide enough information for us to reasonably verify your identity and locate the relevant records.

Verification and response process

- To protect against unauthorized access, deletion, correction, or disclosure, we will take reasonable steps to verify that the person making the request is the individual whose personal information is the subject of the request, or an authorized agent acting on that individual's behalf. Verification may include matching information provided in the request to information already maintained by us, requesting additional identifying information when necessary, or using other reasonable verification procedures appropriate to the nature and sensitivity of the request. We will respond within the timeframes required by applicable law and may deny or limit requests where an exception applies.

Appeals

- If we deny your request in whole or in part, and applicable law gives you a right to appeal, you may appeal our decision by replying to our response or contacting us through the same method used to submit your request. We will review the appeal and provide a written explanation of our decision within the timeframe required by applicable law. If your appeal is denied, you may have the right to contact your state attorney general or other applicable regulator.