PRIVACY NOTICE FOR INDIVIDUALS – Investment Research Corporation (DBA World Capital Brokerage Advisory Services)

The following information contains Investment Research Corporation's ("IRC") privacy policy designed to protect the confidentiality of current or former customer's ("you") non public information. IRC has established a relationship with you as a result of your opening an account with IRC. We receive your nonpublic information ("personal information") for the sole purpose of servicing your account.

Maintaining personal information secure and confidential is a IRC priority. IRC reserves the right to change these policies without notice. This Privacy Notice is intended to give general guidance and does not constitute a legal contract nor create legal rights. This Privacy Notice does not amend or modify any previous agreement(s).

YOUR NONPUBLIC PÉRSONAL INFORMATION.

IRC does not sell your nonpublic personal information. We will only disclose your nonpublic personal information, which includes any personally identifiable information about you, as indicated in this policy, if we have obtained your consent or we are required by law to disclose such information.

NONPUBLIC PERSONAL INFORMATION COLLECTED.

In order to provide you with the highest quality of service, *IRC* collects the following types of nonpublic personal information:

A. Information about you.

- 1. Information you provide to us on applications or forms, such as your income, net worth, social security number and accounts with others;
- 2. Information we receive from an outside company, such as a credit bureau, regarding your credit history or employment status; or
- B. Information about your transactions with us.
- 1. Information that relates to account balance, payment history, trading activity and any other such transactions which IRC provides.
- 2. Information we collect as part of authentication for purposes of servicing your account in a secure and confidential fashion.
- C. Information about your transactions with nonaffiliated third parties.
- 1. Information provided to other nonaffiliated third parties as required by law, including information shared in connection with a subpoena or other legal document compelling our compliance; and
- 2. Information related to servicing your account for purposes of providing clearing services.
- D. Information from a consumer-reporting agency.
- 1. Information from a consumer-reporting agency regarding your creditworthiness or credit history or other information with regard to lending;
- 2. Information about the fact that you are a customer of IRC and we have provided you a financial product or service; and
- 3. Information from other outside sources regarding their employment of, credit to, or other relationship with you, or verifying representations made by you, such as your employment history, loan or credit card balances.

NONPUBLIC PERSONAL INFORMATION DISCLOSED.

Nonpublic personal information is disclosed in connection with servicing your account for the purposes of providing clearing services which includes, among other things, settlement, billing, processing, clearing, transferring, reconciling, collection and tax reporting, provided to nonaffiliated third parties as required by law or with your consent.

AFFILIATES AND NONAFFILIATED THIRD PARTIES TO WHOM WE DISCLOSE.

IRC does not disclose any nonpublic personal information about you except as permitted by law, or required by legal process.

FORMER CUSTOMERS.

 \emph{IRC} will only disclose nonpublic personal information about former customers as required by law.

PRIORITIZING SECURITY OF INFORMATION.

IRC is committed to maintaining appropriate measures to insure that your information is secure and confidential. *IRC*'s information and security procedures include, but are not limited to, the following features:

- 1. Access controls on customer information systems, including controls to authenticate and permit access only to authorized individuals and controls to prevent employees from providing customer information to unauthorized individuals who may seek to obtain this information through fraudulent means.
- 2. Physical access restrictions at locations containing customer information, such as buildings, computer facilities, and record storage facilities to restrict access to unauthorized individuals.
- 3. Encryption of electronic customer information where appropriate.
- 4. Stringent pre-employment screening, including fingerprinting, and segregation of duties for employees with responsibilities for or access to customer information.
- 5. Monitoring systems and procedures to detect actual and attempted attacks on or intrusions into customer information systems.
- 6. Response programs that specify actions to be taken when *IRC* suspects or detects that unauthorized individuals may have gained access to customer information systems.
- 7. A disaster recovery plan to protect against loss or damage to customer information due to potential environmental hazards, such as fire and water damage or technological failures.

IRC regularly revises and updates its information security program to keep pace with changes in technology.

