

<b>FACTS</b>	<b>What Does Opal Capital LLC Do With Your Personal Information?</b>
<b>The Law</b>	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.
<b>Our Policy</b>	<p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> <li>• Income</li> <li>• Employment and residential information</li> <li>• Social security number</li> <li>• Cash balance</li> <li>• Security balances</li> <li>• Transaction detail history</li> <li>• Investment objectives, goals, and risk tolerance</li> </ul> <p>When you are <i>no longer</i> a client, we continue to share your information as described in this notice.</p>
<b>Your Rights</b>	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 Opal Capital chooses to share; and whether you can limit this sharing.
<b>Definitions</b>	
Everyday Business Purposes	The actions necessary by financial companies to run their business and manage customer accounts, such as providing investment advisory and financial planning advice, processing securities transactions, and otherwise providing financial services to you.
Affiliates	<p>Companies related by common ownership or control. They can be financial and non-financial companies. Opal Capital has the following affiliates:</p> <ul style="list-style-type: none"> <li>• Duncanville LLC; 49 Holdings, LLC; 49 Wealth Management, LLC</li> <li>• Polen Capital Management, LLC</li> </ul>
Non-Affiliates	<p>Companies not related by common ownership or control. They can be financial and non-financial companies. Opal Capital does not share information with non-affiliates for marketing purposes. Opal Capital provides portfolio management services to the following non-affiliate Funds:</p> <ul style="list-style-type: none"> <li>• Opal Dividend Income ETF (DIVZ)</li> <li>• Opal International Dividend Income ETF (IDVZ)</li> </ul>
Joint Marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. Opal Capital does not engage in joint marketing with non-affiliates.

Reasons we can share your personal information	Does Opal Capital share?	Can you limit this sharing?
For our everyday business purposes—such as to provide advice, process your transactions, and maintain your account(s)	Yes	No
For our marketing purposes—to offer our products and services to you	Yes	No
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	Yes	Yes
For our affiliates to market to you	Yes	Yes
For non-affiliates to market to you	No	We do not share
<b>Contact Us</b>	Call Opal Capital at 917-716-6257.	

Sharing Practices	
How often does Opal Capital notify me about their practices?	We must notify you about our sharing practices when you become a client or if we change our information sharing policies and procedures.
How does Opal 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 safeguards and secured files and buildings.
How does Opal Capital collect my personal information?	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> <li>• establish an investment advisory relationship</li> <li>• contract for financial planning services</li> <li>• open an account or deposit money with custodians</li> <li>• purchase or sell securities with executing broker-dealers</li> </ul> <p>We also collect your personal information from others, such as custodians, broker-dealers, or other companies.</p>
Why can't I limit all sharing?	<p>Federal law gives you the right to limit sharing only for</p> <ul style="list-style-type: none"> <li>• affiliates' everyday business purposes—information about your creditworthiness</li> <li>• affiliates to market to you</li> <li>• non-affiliates to market to you</li> </ul> <p>State laws and individual companies may give you additional rights to limit sharing.</p>

If you would like a copy of the Opal Capital Form ADV Part 2A and 2B, please send a written request to:

Opal Capital LLC  
5200 Town Center Circle, Suite 305  
Boca Raton, FL 33486

If you wish to modify or impose reasonable restrictions concerning the management of your account, or if your financial situation, investment objectives, or risk tolerance have changed, please contact your Opal Capital investment adviser representative directly or call Austin Graff at 917-716-6257 or email [austin@opalinvest.com](mailto:austin@opalinvest.com). We will contact you at least annually to determine if your investment goals, objectives, and risk tolerance have changed.

We urge that you advise us immediately if you have not received your custodian or brokerage statement, which is required to be delivered to you no less frequently than quarterly. In addition, please compare any account information provided by us with account statements from your broker-dealer or custodian and to advise us of any discrepancies. The official record of your account is maintained by your broker-dealer or custodian. Thank you.

### If you want to limit our sharing

Contact Us

*By telephone:* Call Opal Capital at 917-716-6257.  
*By mail:* Mark your choices below, fill in and send form to:  
  
Opal Capital LLC  
5200 Town Center Circle, Suite 305  
Boca Raton, FL 33486

### Check your choices

*Check any/all you want to limit. Your choices will apply to everyone on your account.*

- ☐ Do not share information about my creditworthiness with your affiliates for their everyday business purposes.
- ☐ Do not allow your affiliates to use my personal information to market to me. (I will receive a renewal notice for this use for marketing in 5 years.)
- ☐ Do not share my personal information with non-affiliates to market their products and services to me.

Your Name

Your Address

Your Account  
Number(s)