

ICG CAPITAL SECURITIES, LLC
ANNUAL PRIVACY POLICY NOTICE – BP EXHIBIT D

Overview

ICG Capital Securities, LLC (ICG) is committed to ensuring the confidentiality of each client's non-public personal information. As you are aware, the financial services business involves access to the most intimate financial and business details. In order to maintain a relationship that is based upon trust and confidentiality, you will be provided with a *Client Privacy Notice* annually if ongoing business is being conducted.

The types of non-public personal information that clients provide to us in order for us to provide services may include, but is not limited to: name, address, social security or tax identification number, total assets, net worth, income, and bank account information. This policy addresses what ICG does with this information both with respect to related and non-related third parties. For purposes of this document, issuers of securities for whom we act as a selling agent are considered non-related entities. ICG has one related third-party affiliate but will not share information without prior written approval.

Privacy Policy

Except as required by law, ICG does not disclose any non-public personal information about our clients or former clients to any person or entity not directly affiliated with our firm. However, we may disclose non-public information that we collect to the issuer(s) of the securities that clients ask to purchase or we may share some non-public information of an issuer with a client who is considering purchasing an interest in its business, assets, etc.

Also, we may share some information such as names and addresses to non-affiliated entities to enable them to provide business services on our behalf. Examples of these services are assisting us in mailing sales literature, processing a transaction, and performing general administrative activities for us. These types of services sometimes are necessary in order for us to conduct business. However, rest assured that any service provider that we do business with is contractually obligated to ensure that none of your personal information will be disclosed, except as required by law.

In order to assure that all non-public information is treated in a confidential manner, our employees are required to protect the confidentiality of our clients' information. If they do not comply with our policies, employees are subject to disciplinary rules. Also we maintain physical, electronic, and procedural safeguards to protect all non-public information.

Opt-Out Policy

As we will not be sharing any non-public information either with related or non-related third parties, unless necessary to facilitate a transaction, neither an opt-in or opt-out provision is applicable. If you have any questions regarding our Privacy Policy, please contact our CEO: Scott Upton at (704) 332-1930 or mobile (704) 819-3882; scott.upton@icgcap.com