

# ROBIN CAPITAL GROUP LLC

## PRIVACY POLICY

*Client Privacy Notice | Information Security | Your Rights*

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<b>Privacy Officer</b>	Ashley Schott, CCO
<b>Contact</b>	aschott@robincapitalgroup.com   305-905-7769
<b>Effective Date</b>	January 1, 2026
<b>Annual Distribution</b>	Delivered to all clients at onboarding and annually by March 31
<b>Regulation</b>	Regulation S-P (SEC)   Florida Information Protection Act 2014

11 Island Ave, Unit 1107 | Miami Beach, FL 33139 | 305-905-4969  
[www.robincapitalgroup.com](http://www.robincapitalgroup.com) | [info@robincapitalgroup.com](mailto:info@robincapitalgroup.com)

# 1. INTRODUCTION — YOUR PRIVACY MATTERS TO US

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Robin Capital Group LLC ("Robin Capital," "RCG," "we," "us," or "our") is committed to protecting the privacy of our clients. This Privacy Policy describes how we collect, use, protect, and share your personal information in connection with your investment advisory relationship with us.

We are required to provide this notice to all individual clients under Regulation S-P (17 C.F.R. Part 248) and the Florida Information Protection Act of 2014. We provide this notice at the start of our advisory relationship and annually thereafter. Please read it carefully.

## WHO THIS NOTICE APPLIES TO

This Privacy Policy applies to all current and former individual clients of Robin Capital Group LLC — including individuals, joint account holders, and individuals acting on behalf of trusts, estates, or other accounts. It does not apply to institutional clients acting solely in a business capacity, although we protect all client information with the same standards.

## 2. INFORMATION WE COLLECT

The personal information we collect about you depends on the products and services you use. We collect information about you from two primary sources:

### A. Information You Provide to Us

When you open an account or engage our services, you provide us with:

Category	Examples
Personal Identification	Full legal name, date of birth, government-issued ID (passport or driver's license number), Social Security Number or Tax ID (W-9 / W-8BEN)
Contact Information	Residential address, mailing address, email address, telephone number
Financial Information	Investment objectives, risk tolerance, time horizon, net worth, income, source of funds, existing account information, employment information
Account Documentation	Signed Discretionary Investment Advisory Agreement, beneficiary designations, trust or entity documents (if applicable)
Tax Documentation	W-9 (U.S. persons) or W-8BEN (non-U.S. persons) for tax withholding compliance

### B. Information We Receive from Your Custodian

All client assets are held at Interactive Brokers LLC ("IB"), our sole qualified custodian. IB maintains all financial account data — including account numbers, balances, trade confirmations, statements, and fee invoices — as part of the custodial relationship. IB is subject to its own privacy and data protection obligations as a FINRA/SIPC-regulated broker-dealer.

RCG does not store or maintain your financial account data, trade history, account balances, or tax documents. These records are held and managed exclusively by IB. You will receive separate privacy disclosures from IB as your custodian.

### C. Information We Collect Automatically

If you contact us by email or through our website (robincapitalgroup.com), we may collect your email address, IP address, and any information you include in your communications with us.

### 3. HOW WE USE YOUR INFORMATION

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We use your personal information solely for legitimate business purposes in connection with your investment advisory relationship. Specifically, we use your information to:

- Provide discretionary investment management services pursuant to your Discretionary Investment Advisory Agreement
- Assess your investment suitability, risk tolerance, and financial objectives
- Open and maintain your account at Interactive Brokers
- Communicate with you about your account, our services, and material developments
- Fulfill our regulatory obligations under Florida law and federal securities regulations (Form ADV delivery, annual privacy notices, tax reporting)
- Comply with anti-money laundering (AML) and Know Your Customer (KYC) requirements
- Screen against OFAC Specially Designated Nationals (SDN) lists and FinCEN watchlists
- Maintain accurate books and records as required by state and federal law
- Respond to your inquiries and resolve disputes
- Prevent fraud, identity theft, and unauthorized access to your account

#### WE WILL NEVER SELL YOUR INFORMATION

Robin Capital Group LLC will never sell, rent, or trade your personal information to third parties for their marketing purposes under any circumstances.

## 4. HOW WE SHARE YOUR INFORMATION

The table below summarizes the reasons we may share your personal information, whether we share it, and whether you can limit our sharing. This table is required by Regulation S-P.

Reasons we can share your personal information	Do we share?	Can you limit this sharing?
For our everyday business purposes — such as to process your transactions, maintain your account, 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	YES	NO
For joint marketing with other financial companies	NO	N/A
For our affiliates' everyday business purposes — information about your transactions and experiences	NO	N/A
For our affiliates' everyday business purposes — information about your creditworthiness	NO	N/A
For our affiliates to market to you	NO	N/A
For non-affiliates to market to you	NO	N/A

### Permitted Disclosures to Third Parties

In the ordinary course of business, we may share your information with the following categories of third parties, solely to service your account or fulfill our legal obligations:

Third Party	Purpose
<b>Interactive Brokers LLC (Custodian)</b>	Account opening, custody, trade execution, fee deduction, statement generation, and regulatory reporting. IB is your primary financial account service provider.
<b>Legal Counsel (Alcantara Law LLC)</b>	Legal advice, regulatory guidance, and compliance review. Subject to attorney-client confidentiality.
<b>Accountants / Tax Advisors</b>	Tax preparation and financial reporting, solely as directed by you or required by law.
<b>Regulators and Government Authorities</b>	Florida OFR, SEC, FINRA, IRS, and law enforcement, as required by applicable law, court order, or regulatory examination.
<b>OFAC / FinCEN Screening Services</b>	Watchlist screening required by federal AML and sanctions law.

## 5. HOW WE PROTECT YOUR INFORMATION

We take the security of your personal information seriously. Our security practices are designed around the actual data we hold — which is limited in scope because your financial account data is held at Interactive Brokers, not at RCG.

### A. What Data RCG Holds and How We Protect It

Data We Hold	Where We Store It	How We Protect It
<b>Your contact information and advisory documents (name, address, email, signed agreement, suitability profile)</b>	Microsoft OneDrive and Google Workspace — encrypted at rest by enterprise providers	Multi-factor authentication; access restricted to RCG personnel only; files not shared externally; 5-year retention
<b>Your financial account data (balances, trades, statements, invoices)</b>	Held entirely at Interactive Brokers, not at RCG	IB is a FINRA/SIPC-regulated broker-dealer with institutional security infrastructure. RCG does not store this data.
<b>Email and written communications with RCG</b>	Google Workspace and Microsoft 365 email systems	Enterprise email security; retained per regulatory books and records requirements

### B. Technical Security Measures

- Multi-factor authentication (MFA) is required on all cloud accounts used by RCG (IB Advisor Portal, Microsoft OneDrive, Google Workspace, and email)
- Access to your information is restricted to RCG personnel with a legitimate business need
- Strong password policies are enforced for all RCG systems
- Client files are encrypted at rest by cloud service providers (Microsoft and Google provide enterprise-grade encryption)
- Your personal information is never transmitted via unencrypted external communications
- Upon termination of any RCG employee, access to all systems containing client data is revoked immediately

### C. Physical Security

- RCG's offices are private residences with restricted access
- Client documents in hard copy format are stored securely and are not left unattended in accessible locations
- Prior to disposal of any device containing client information, data is permanently and securely erased

## 6. DATA RETENTION

We retain your personal information for as long as required by applicable law and our regulatory obligations. Florida and federal securities law require us to maintain advisory records for at least five years. Your account documents and suitability information are retained for the duration of our advisory relationship and for five years thereafter.

Record Type	Retention Period	Storage
Advisory agreements and suitability documents	5 years from account closure	OneDrive + Physical
Client contact information	Duration of relationship + 5 years	OneDrive
KYC / AML identification documents	5 years from account closure	OneDrive + Physical
Correspondence and communications	5 years	Google Workspace / Microsoft 365
Privacy notice delivery records	5 years	OneDrive
Annual compliance and review records	5 years	OneDrive

*When records reach the end of their retention period, documents containing your personal information are securely destroyed — shredded (physical documents) or permanently erased (electronic files) — so that the information cannot be read or reconstructed.*

## 7. YOUR RIGHTS & OPT-OUT OPTIONS

### A. Opt-Out Rights Under Regulation S-P

We do not share your personal information with non-affiliated third parties for their marketing purposes. Because we do not engage in this type of sharing, there is nothing for you to opt out of with respect to non-affiliate sharing. If our sharing practices change in the future, we will provide you with the required opt-out notice and a reasonable opportunity to opt out before any such sharing begins.

### B. Your Right to Accurate Information

You have the right to request that we correct inaccurate information in our records. If you believe any personal information we hold about you is incorrect, please contact our Privacy Officer:

PRIVACY OFFICER CONTACT	
<b>Name</b>	Ashley Schott — Chief Compliance Officer & Privacy Officer
<b>Email</b>	aschott@robincapitalgroup.com
<b>Phone</b>	305-905-7769
<b>Mail</b>	Robin Capital Group LLC, 11 Island Ave, Unit 1107, Miami Beach, FL 33139

### C. California and Other State Privacy Rights

Clients who are residents of California or other states with specific consumer privacy laws may have additional rights under applicable state law, including rights to access, deletion, and portability of personal data. Please contact our Privacy Officer to exercise any such rights. We will respond to verified requests within the timeframe required by applicable law.

## 8. SECURITY BREACH NOTIFICATION

In the event of a security breach affecting your personal information, we will notify you promptly in accordance with applicable law. Our breach notification procedures are as follows:

NOTIFICATION OBLIGATION	PROCEDURE
<b>Notification to affected clients</b>	We will notify you promptly if a breach of your personal information has occurred or is reasonably likely to have occurred, describing the nature of the breach and steps you can take to protect yourself.
<b>Notification to Florida Attorney General</b>	Under the Florida Information Protection Act of 2014: if a breach affects 500 or more Florida residents, we must notify the Florida Department of Legal Affairs (Attorney General) within 30 days of determining that a breach has occurred.
<b>Notification to other regulators</b>	We will notify the Florida OFR and other applicable regulators as required by law.
<b>Breach involving IB-held data</b>	If a breach involves your financial account data held at Interactive Brokers, IB's own breach notification procedures apply. IB will notify you directly as required. RCG will coordinate with IB and notify you of any impact to RCG-held information.

## 9. FORMER CLIENTS

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When your advisory relationship with Robin Capital Group LLC ends, we continue to protect your personal information in accordance with this Privacy Policy and applicable law. We retain your records for the periods described in Section 6 and do not share your information with non-affiliated third parties for marketing purposes after the termination of our relationship.

## 10. CHANGES TO THIS PRIVACY POLICY

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We may update this Privacy Policy from time to time to reflect changes in our practices, regulatory requirements, or business operations. We will deliver any material changes to you as required by law — either by providing a revised notice or by clearly describing the changes in our annual privacy notice delivery. The effective date at the top of this document reflects when the current version took effect.

The most current version of this Privacy Policy is always available by contacting our Privacy Officer at [aschott@robincapitalgroup.com](mailto:aschott@robincapitalgroup.com).

# 11. CLIENT ACKNOWLEDGEMENT OF RECEIPT

This section is completed at account opening. A copy is retained in your client file.

PRIVACY POLICY ACKNOWLEDGEMENT	
I/We acknowledge receipt of the Robin Capital Group LLC Privacy Policy effective January 1, 2026, and confirm that I/we have read and understood its contents.	
Client Name (Print): _____	
Client Signature: _____	Date: _____
Joint Account Holder (if applicable): _____	
Joint Account Signature: _____	Date: _____
IB Account Number: _____	RCG Client File: _____

ANNUAL NOTICE DELIVERY RECORD — FOR INTERNAL USE
Annual privacy notices are delivered to all individual clients by March 31 each year, concurrent with the Form ADV annual brochure delivery. The Privacy Officer (Ashley Schott) maintains a delivery log documenting the date sent and confirmation of delivery for each client. This log is retained for a minimum of five years.