2020 ANNUAL DISCLOSURE STATEMENT

Anti-Money Laundering: FINRA Rule 3310

Gatsby Securities, LLC ("Gatsby Securities") has a strong commitment to detecting and deterring any and all forms of money laundering and/or the funding of terrorist or criminal activities. It is Gatsby Securities policy to comply with all laws and regulations designed to combat money laundering activity, including verifying and recording information that identifies each person who opens an account. When you open an account, we collect information such as the following from you: your name, address, date of birth, identification number: (a) US Citizen: taxpayer identification number (social security number or employee identification number), or (b) Non-US Citizen: taxpayer identification number, passport number and country of issuance, alien identification card number, or government- issued identification showing nationality, residence, and a photograph of you. You may also need to show your driver's license or other identifying documents. A corporation, partnership, trust or other legal entity may need to provide other information such as its principal place of business, local office, employer identification number, certified articles of incorporation, government issued business license, a partnership agreement or a trust agreement. US Department of the Treasury, Securities and Exchange Commission, FINRA and NYSE regulation currently require you to provide additional information, such as net worth, annual income, occupation, employment information, investment experience and objectives, and risk tolerance. If all of the required information is not provided, you will not be able to open an account or process transactions.

Gatsby Securities 2020 Privacy Policy

Pursuant to Title V of the Gramm-Leach-Bliley Act and United States Securities and Exchange Commission ("SEC") Regulation S-P (17 CFR 248.1-248.30), this document sets forth the Privacy Policy of Gatsby Securities, LLC ("Gatsby Securities"), concerning the privacy interests of individual consumers and customer's (described below and hereinafter referred to as "customers") of Gatsby Securities. Gatsby Securities is a securities Broker Dealer registered with the SEC. Among its other securities related memberships and associations, Gatsby Securities is a member of the Financial Industry Regulatory Authority ("FINRA") and the Securities Investor Protection Corporation ("SIPC"). Gatsby Securities is a fully disclosed securities Broker Dealer ("BD") in accordance with all laws, rules and regulations applicable to a securities BD and the business conducted by a securities BD. As a BD Gatsby Securities principal business is to facilitate the execution of orders received on a solicited and unsolicited basis for both its institutional and non-institutional clients. Gatsby Securities has clearing agreements with APEX Clearing Corporation, which provide defined "back-office" securities clearing, custodial and processing services. In its capacity as a securities BD, Gatsby Securities receives and/or comes into contact with certain non-public personal information concerning its current and/or former customers, including but not limited to certain non- public personal information related to the securities account(s) that customers open and/or maintain with Gatsby Securities. Any and all such nonpublic personal information related to such customers and/or such customers' securities account(s) is hereinafter referred to as "non-public personal information". Gatsby Securities receives and/or comes into contact with the non-public personal information only for purposes of conducting its business as described above. For convenience herein, "you" or "your" refers to any and all customer(s) described above.

NON-PUBLIC PERSONAL INFORMATION COLLECTED

In conducting its business as described above, Gatsby Securities collects (or may collect), for example, the following types of nonpublic personal information: 1. Information about you: (1) information you provide in connection with securities account, margin loan, debit card or any other financial product or service, whether in writing, in person, by telephone, electronically or by any other means, such as your name, address, social security number, tax ID number, assets, income, investment objectives, financial situation and debt; and (2) information Gatsby Securities obtains (or may obtain) for the purpose of tax reporting to you and to various agencies to which Gatsby Securities reports as required by law, including disclosures on various Internal Revenue Service (IRS) forms that Gatsby Securities and/or its clearing firm collects for tax reporting purposes. 2. Information about your securities and/or other transactions: (1) information Gatsby Securities collects and relates to account balance, payment history, trading activity and any other transactions concerning which Gatsby Securities provides brokerage Version services; (2) information Gatsby Securities collects as part of servicing your account(s), as a BD; and (3) information Gatsby Securities may collects through an internet "cookie" (an information collecting device from a web server). 3. Information about your transactions with nonaffiliated third parties: (1) information from nonaffiliated third parties pursuant to law, rules, regulations, standard securities industry practice and/or legal process, including information and/or documents received, shared, produced or provided in connection with a subpoena, discovery request or other legal process compelling production; and (2) information from non affiliated third parties related to servicing your account for purposes of providing securities BD services. 4. Information from a consumer reporting agency: (1) information from a consumer reporting agency regarding your creditworthiness or credit history or other information with regards to margin lending or other financial transactions; (2) information about the fact that you are a customer of Gatsby Securities; 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.

We may share or sell information with others in an aggregated or otherwise anonymized form that does not reasonably identify you directly as an individual.

NON-PUBLIC PERSONAL INFORMATION DISCLOSED TO AFFILIATES AND NONAFFILIATED THIRD PARTIES.

Gatsby Securities discloses to its affiliates and nonaffiliated third parties non-public personal information only in connection with Gatsby Securities providing securities BD services or when in an aggregated or otherwise reasonably anonymized form. Such disclosures include, among other things, information related to transactions, settlement, billing and payment. Such disclosures may be provided to affiliates and nonaffiliated third parties: (i) as required or necessary to carry out fully and properly the securities business of Gatsby Securities (such as, for example, disclosures to affiliated and non-affiliated third party service providers supplying to Gatsby Securities computer related, document processing and delivery, and data maintenance or processing services, and disclosures to nonaffiliated third parties such as clearing agencies and entities); (ii) as required by law or legal process; or (iii) with your consent.

FORMER CUSTOMERS

Gatsby Securities will disclose non-public personal information about the former customers of Gatsby Securities only as permitted and/or required by law or legal process, or with your consent, or when done in an aggregated or otherwise reasonably anonymized form.

CONFIDENTIALITY AND SECURITY OF NON-PUBLIC PERSONAL INFORMATION

Gatsby Securities is committed to implementing and maintaining commercially reasonable and appropriate measures to maintain your non-public personal information in a secure and confidential fashion. Gatsby Securities information and security procedures may 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 Gatsby Securities employees from providing non-public information to unauthorized individuals who may seek to obtain this information through fraudulent means. 2. Physical access restrictions at locations containing non-public personal information 3. Stringent pre-employment screening, including fingerprinting, and segregation of duties for Gatsby Securities employees with responsibilities for or access to non-public information. Gatsby Securities regularly reviews, revises and updates its information security program to account for changes in technology. Gatsby Securities reserves the right to change this Privacy Policy at anytime. Any changes posted to www.trygatsby.com will become effective as posted. It is the client's responsibility to check for updates and changes to this document.

DISPLAY ADVERTISING

The Google Analytics features we have implemented are based on Displayed Advertising (e.g., Remarketing). Visitors can opt-out of Google Analytics for Display Advertising and customize Google Display Network by using the Ads Preference Manager.

Business Continuity Plan: FINRA Rule 4370

Gatsby Securities has developed a Business Continuity Plan ("BCP") that assigns responsibilities and outlines procedures in the event of a disaster or emergency which impacts Gatsby Securities ability to continue conducting business (also termed a "significant business disruption"). You may obtain a copy of our most current BCP on our website: www.trygatsby.com.

SEC Rule 606 and 607

Disclosure of Payment for Order flow and Order Routing Information Pursuant to SEC Rule 606,

Gatsby Securities is required to make publicly available a quarterly report with regard to its routing of non-directed orders. This information can be accessed on our website: www.trygatsby.com. SEC Rule 606(b) requires a broker-dealer to disclose to its customers, upon request, "the identity of the venue to which the customer's orders were routed for execution in the six months prior to the request, whether the orders were directed orders or non-directed orders, and the time of the transactions, if any, that resulted from such orders." Pursuant to SEC Rule 607, Gatsby Securities is required to disclose its payment for Order Flow practices. Gatsby Securities sends certain equity orders to exchanges, electronic communication networks, or broker-dealers during normal business hours and during extended trading sessions. Some of those market centers provide payments to Gatsby Securities, or charge access fees depending upon the characteristics of the order and any subsequent execution. The details of these payments and fees are available upon written request. Gatsby Securities receives payments for directing listed options order flow to certain option exchanges. Compensation is generally in the form of a per-option contract payment.

Margin Disclosure Statement: FINRA Rule 2264

We are furnishing this document to you to provide some basic facts about purchasing securities on margin, and to alert you to the risks involved with trading securities in a margin account. Before trading stocks in a margin account, you should carefully review the margin agreement provided by your broker. Consult your broker regarding any questions or concerns you may have with your margin accounts.

When you purchase securities, you may pay for the securities in full or you may borrow part of the purchase price from your brokerage firm. If you choose to borrow funds from your firm, you will open a margin account with the firm. The securities purchased are the firm's collateral for the loan to you. If the securities in your account decline in value, so does the value of the collateral supporting your loan, and as a result, the firm can take action, such as issue a margin call and/or sell securities in your account, in order to maintain the required equity in the account.

It is important that you fully understand the risks involved in trading securities on margin.

These risks include the following:

- You can lose more funds than you deposit in the margin account A decline in the value of securities that are purchased on margin may require you to provide additional funds to the firm that has made the loan to avoid the forced sale of those securities or other securities in your account.
- The firm can force the sale of securities in your account If the equity in your account falls below the maintenance margin requirements under the law, or the firm's higher "house" requirements, the firm can sell the securities in your account to cover the margin deficiency. You also will be responsible for any shortfall in the account after such a sale.
- The firm can sell your securities without contacting you Some investors mistakenly believe that a firm must contact them for a margin call to be valid, and that the firm cannot liquidate securities in their accounts to meet the call unless the firm has contacted them first. This is not the case. Most firms will attempt to notify their customers of margin calls, but they are not required to do so. However, even if a firm has contacted a customer and provided a specific date by which the customer can meet a margin call, the firm can still take necessary steps to protect its financial interest, including immediately selling the securities without notice to the customer.
- You are not entitled to choose which security in your margin account is liquidated or sold to meet a margin call Because the securities are collateral for the margin loan, the firm has the right to decide which security to sell in order to protect its interests.
- The firm can increase its "house" maintenance margin requirement at any time and is not required to provide you advance written notice These changes in firm policy often take effect immediately and may result in the issuance of a maintenance margin call. Your failure to satisfy the call may cause the Firm to liquidate or sell securities in your account.
- You are not entitled to an extension of time on a margin call While an extension of time to meet margin requirements may be available to customers under certain conditions, a customer does not have a right to the extension. • The IRS requires Broker Dealers to treat dividend payments on loaned securities positions as in-lieu dividends for 1099 tax reporting purposes Taxation of substitute dividend payments may be greater than ordinary on qualified dividends.

Extended Hours Trading Risk Disclosure: FINRA Rule 2265

- Risk of Lower Liquidity Liquidity refers to the ability of market participants to buy and sell securities. Generally, the more orders that are available in a market, the greater the liquidity. Liquidity is important because with greater liquidity it is easier for investors to buy or sell securities, and as a result, investors are more likely to pay or receive a competitive price for securities purchased or sold. There may be lower levels of liquidity in extended hours trading as compared to regular market hours. As a result, your order may only be partially executed, or not at all.
- Risk of Higher Volatility Volatility refers to the changes in price that securities undergo when trading. Generally, the higher the volatility of a security, the greater its price swings. There may be greater levels of volatility in extended hours trading than in regular market hours. As a result, your order may only be partially executed, or not at all, or you may receive an inferior price in extended hours trading to what you might receive during regular market hours.
- Risk of Changing Prices The prices of securities traded in extended hours trading may not reflect the prices either at the end of regular market hours, or upon the opening of the next morning. As a result, you may receive an inferior price in extended hours trading to what you might receive during regular market hours.
- Risk of Unlinked Markets Depending on the extended hours trading system or the time of day, the prices displayed on a particular extended hour's system may not reflect the prices on other concurrently operating extended hours trading systems dealing in the same securities. Accordingly, you may receive an inferior price on one extended hours trading system than you might receive on another extended hours trading system.
- Risk of News Announcements Normally, issuers release news announcements that may affect the price of their securities after regular market hours. Similarly, important financial information is frequently announced outside of regular market hours. In extended hours trading, these announcements may occur during trading,

and if combined with lower liquidity and higher volatility, may cause an exaggerated and unsustainable effect on the price of a security.

- Risk of Wider Spreads The spread refers to the difference in price between what you can buy a security for and what you can sell it for. Lower liquidity and higher volatility in extended hours trading may result in wider than normal spreads for a particular security.
- Risk of Lack of Calculation or Dissemination of Underlying Index Value or Intraday IndicativeValue ("IIV") For certain Derivative Securities Products, an updated underlying index value, or IIV, may not be calculated or publicly disseminated in extended trading hours. Since the underlying index value and IIV are not calculated or widely disseminated during the pre-market and post-market sessions an investor who is unable to calculate implied values for certain Derivative Securities Products in those sessions may be at a disadvantage to market professionals.

Day-Trading Risk Disclosure Statement: FINRA Rule 2270

You should consider the following points before engaging in a day-trading strategy. For purpose of this notice, a "daytrading strategy" means an overall trading strategy characterized by the regular transmission by a customer of intra-day orders to effect both purchase and sale transactions in the same security or securities.

- Day trading can be extremely risky Day trading, generally, is not appropriate for someone of limited resources and limited investment or trading experience and low risk tolerance. You should be prepared to lose all of the funds that you use for day trading. In particular, you should not fund day-trading activities with retirement savings, student loans, second mortgages, emergency funds, funds set aside for purposes such as education or home ownership or funds required to meet your living expenses. Further, certain evidence indicates that an investment of less than $50,000 will significantly impair the ability of a day trader to make a profit. Of course, an investment of $50,000 or more in no way guarantees success.
- Be cautious of claims of large profits from day trading You should be wary of advertisements or other statements that emphasize the potential for large profits as a result of day trading. Day trading can lead to large and immediate financial losses. Version 20190123
- Day trading requires knowledge of securities markets Day trading requires in-depth knowledge of the securities markets and trading techniques and strategies. In attempting to profit through day trading, you must compete with professional, licensed traders employed by securities firms. You should have appropriate experience before engaging in day trading.
- Day trading requires knowledge of a firm's operations You should be familiar with a securities firm's business practices, including the operation of the firm's order execution systems and procedures. Under certain market conditions, you may find it difficult or impossible to liquidate a position quickly at a reasonable price. This can occur, for example, when the market for a stock suddenly drops, or if trading is halted due to recent news events or unusual trading activity. The more volatile a stock is, the greater the likelihood that problems may be encountered in executing a transaction. In addition to normal market risks, you may experience losses due to system failures.
- Day trading will generate substantial commissions, even if the per trade cost is low Day trading involves aggressive trading, and generally you will pay commissions on each trade. The total daily commissions that you pay on your trades will add to your losses or significantly reduce your earnings. For instance, assuming that a trade costs $16 and an average of 29 transactions are conducted per day, an investor would need to generate an annual profit of $111,360 just to cover commission expenses.
- Day trading on margin or short selling may result in losses beyond your initial investment When you day trade with funds borrowed from a firm or someone else, you can lose more than the funds you originally placed at risk. A decline in the value of the securities that are purchased may require you to provide additional funds to the firm to avoid the forced sale of those securities or other securities in your account. Short selling as part of your day trading strategy also may lead to extraordinary losses, because you may have to purchase a stock at a very high price in order to cover a short position.