



FACTS	WHAT DOES REYL OVERSEAS LTD ("ROVS") DO WITH YOUR PERSONAL INFORMATION?
Why?	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.
What?	The types of personal information we collect and share depend on the product or service you have with us.  This information can include:  Your last name, first name, date of birth, domicile, phone number, e-mail address; Social Security number and wire transfer instructions; Account balances and assets; Transaction history and payment history.  When you are no longer our customer, we continue to share your information as described in this notice.
How?	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 ROVS chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does ROVS share?	Can you limit this sharing?
For our everyday business purposes — such as to process your transactions (including mirroring of accounts using licensed software), maintain your account(s), 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	No	We don't share
For joint marketing with other financial companies	No	We don't share
For our affiliates' everyday business purposes — information about your transactions and experiences	No	We don't share
For our affiliates' everyday business purposes — information about your creditworthiness	No	We don't share
For our affiliates to market to you	No	We don't share
For nonaffiliates to market to you	No	We don't share

Who we are	
Who is providing this notice?	REYL OVERSEAS LTD ("ROVS")

What we do		
How does ROVS 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 ROVS collect my personal information?	We collect your personal information, for example, when you  Open an account with us Provide account information Enter into an investment advisory contract or seek advice about your investments Direct us to buy securities or direct us to sell your securities  We also collect your personal information from others, such as custodian banks, credit bureaus, affiliates, or other companies.	





What we do (continued)			
Why can't I limit all sharing?	Federal law gives you the right to limit only		
	<ul> <li>Sharing for affiliates' everyday business purposes information about your creditworthiness</li> <li>Affiliates from using your information to market to you</li> <li>Sharing for nonaffiliates to market to you</li> <li>State laws and individual companies may give you additional rights to limit sharing.</li> </ul>		

Definitions	
Affiliates	Companies related by common ownership or control. They can be financial and non-financial companies.
	<ul> <li>Our affiliates are other Reyl Group Companies: Reyl &amp; Cie Ltd (Switzerland), Reyl &amp; Cie (Malta) Ltd, Malta, Reyl &amp; Co (UK) LLP, Reyl Private Office (Luxembourg) LLC, GAP Manco LLC, Luxembourg, Reyl Singapore Pte Ltd, Reyl Finance MEA Ltd</li> </ul>
Non-affiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies.
	<ul> <li>ROVS does not share with non-affiliates so they can market to you</li> </ul>
Joint marketing	A formal agreement between non-affiliated financial companies that together market financial products or services to you.
	<ul> <li>ROVS does not jointly market</li> </ul>

Generally speaking, we do not share any information with unauthorized third parties except for where mandated under our obligation to comply with legal or regulatory requests.

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