

NOTICE OF PRIVACY POLICIES

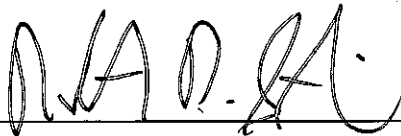
This notice describes how non-public information about you is treated by Galway Capital, LP. Your information is important and confidential. Our ethics and policies require that your information be held in strict confidence.

Prior to undertaking an assignment for private placement of debt or equity, or for sale of oil and gas interests, or an investment banking (M&A) activity, it is the firm's practice to enter into a detailed engagement agreement with the client. This engagement agreement typically includes specific confidentiality provisions agreed to by the parties, or it may reference a separate confidentiality agreement containing such provisions. In this fashion, the confidentiality/privacy terms for each assignment are tailored by the parties. It is the firm's policy and practice to maintain the privacy of client's non-public information at all times and under all circumstances.

Galway Capital maintains procedures to ensure the security and confidentiality of your information. We employ physical security in our building, passwords to protect our databases, compliance audits, and virus/intrusion detection software. Access to information is limited to those who need it to perform assignments. In very limited instances where we outsource certain undertakings to third parties, we require that they enter into confidentiality agreements, that include components to protect the confidentiality of clients information. We also periodically purge files of unneeded documents and shred those that are no longer needed. Backup copies of the more critical documents are held in a safe location off-site, as provided in our Business Continuity Plan.

The firm may disclose non-public information as required by law, but would only do so after giving the client advance notice of its intent to do so in order to enable the client to assert its legal rights to protect its confidential proprietary information. The firm may also be required to disclose information in compliance with FINRA or SEC oversight activities, such as audits, investigations and inspections, necessary to ensure compliance with government regulations including the firm's obligations under its Anti-Money Laundering Compliance Program.

Signed: _____



Title: Managing Director, Chief Compliance Officer

Dated: December 30, 2015