

Churchill Capital USA, Inc.

Notice of Privacy

This privacy notice complies with the Gramm-Leach-Bliley Act and federal regulations governing the privacy of financial information applicable to our clients.

Churchill Capital USA, Inc. Notice of Privacy

We are committed to providing our clients with quality service. While collecting information about you is essential to meet your needs, we recognize the importance of handling your personal information with care. Accordingly, we have established this Notice of Privacy and related policies.

Confidentiality and Security of Your Information

We maintain appropriate physical, electronic, and procedural safeguards to protect the security and confidentiality of your nonpublic personal information. We educate our employees about the terms of this Notice and the importance of customer privacy. We restrict access to nonpublic personal information about you to those employees and others who need to know that information to provide services to you, to maintain your accounts, or conduct our business.

Information We Collect About You

Collecting information from you is essential to our ability to offer quality services. As part of that process, we may collect nonpublic information about you from the following sources:

- Information we receive from you on applications and other forms;
- Information about your transactions with us;
- Based upon the services provided, information we receive from consumer reporting agencies, government agencies and from your agent banks and prime brokers where applicable; and
- Information that is used to facilitate emails from you.

Categories of Information We Disclose and to Whom

We do not disclose any information about our clients or former clients to anyone, except as permitted or required by law. We may disclose the types of information listed below to companies that help us conduct our business, that perform administrative or other services on our behalf, or other financial institutions with which we now or may have joint marketing agreements:

- Information we receive from you on applications and other forms, such as your name, address, Social Security number (if an individual), assets, income and beneficiaries;
- Information about your transactions with us, or others; and
- Information we receive from a consumer reporting agency, government agencies and from your agent banks and prime brokers where applicable, and from other sources, such as information concerning credit worthiness and history, and certain information requested pursuant to US Patriot Act anti-money laundering prevention rules and regulations.

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Anti-Money Laundering

Customer Identity Verification Notice

To help the government fight the funding of terrorism and money laundering activities, federal law requires broker-dealer firms to obtain, verify, and record information that identifies each person who opens an account.

What types of information will you need to provide?

For an individual, when you open an account, we are required to collect information such as the following from you: Your name, Date of birth, Address, Identification number: U.S. Citizen: taxpayer identification number (social security number or employer identification number) or Non-U.S. 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.

For an entity, when an account is opened, we are required to collect information such as the following from the entity: documents showing the existence of the entity, such as certified articles of incorporation, a government-issued business license, a partnership agreement, or a trust instrument. We may additionally be required to obtain information identifying all beneficial owners of a specific entity and apply the documents required to individuals to all beneficial owners.

We may, under the following circumstances, rely on the performance by another financial institution (including an affiliate) of some or all of the elements of the our customer identification program with respect to any customer that is opening an account or has established an account or similar business relationship with the other financial institution to provide or engage in services, dealings, or other financial transactions:

Such reliance is reasonable under the circumstances, when the other financial institution is subject to a rule implementing the anti-money laundering compliance program requirements and is regulated by a Federal functional regulator and when the other financial institution has entered into a contract with us requiring it to certify annually to us that it has implemented its anti-money laundering program, and that it will perform (or its agent will perform) specified requirements of the customer identification program.

FINRA RULE 2266 - SIPC INFORMATION

As a member of the Securities Investor Protection Corporation (SIPC) funds are available to meet customer claims up to a maximum of \$500,000 in cash and securities, with a \$100,000 cash maximum. This protection is provided by the Securities and Investors Protection Act, which is administered by SIPC and is subject to certain conditions and limitations, details of which are available upon request. Information about SIPC, including the SIPC brochure, may be obtained by contacting SIPC: SIPC Web site address (www.sipc.org) SIPC telephone number (202-371-8300).

Churchill Capital USA, Inc.

SEC Rule 17a-3(a)(18) – Customer Complaints

Dear Client or Investor:

SEC rule 17a-3(a)(18) requires our firm to maintain a record indicating that each client or investor has been provide with a notice containing the address to which you may transmit any complaints that you may have respecting our firm.

Additionally, our firm must ensure that you are provided with a notice indicating the telephone number and the address at our firm to which such complaints may be directed.

Our firm hereby provides the following address and telephone number to which any customer complaints may be directed:

Churchill Capital USA, Inc
1270 Avenue of the Americas, Suite 1910
New York, NY 10020
212-994-4990

Business Continuity Plan

Summary Disclosure Statement

Churchill Capital USA, Inc. (“the Firm”), pursuant to Financial Industry Regulatory Authority, Inc. (“FINRA”) rules, has created a Business Continuity Plan, to address and guide our response to and recovery from Significant Business Disruptions (“SBDs”). Copies of this Summary Disclosure Statement shall be given to all clients at the time they open their accounts with the Firm. The Firm’s Business Continuity Plan is subject to modification and an updated summary will be promptly mailed or e-mailed to our clients. Alternatively, clients may obtain updated summaries by requesting a written copy by mail or fax.

In all of the following scenarios, the Firm plans to continue business and our planned recovery time, depending upon the time of occurrence, should not exceed 24 hours from the time of the declaration of the SBD. Staff, telephone calls, and e-mails will return to their original location upon full restoration of service.

Disruption to a single building or our Firm’s main office

If a disruption occurs in our business district affecting our main office located at 1270 Avenue of the Americas, Suite 1910, New York, NY 10020-1700 or any of our branch offices we will reroute incoming telephone calls to individual cell phones of our Firm personnel. Firm personnel will be directed to proceed to an alternate location or locations. These locations shall be outside the business district and may include home offices of key personnel.

Churchill Capital USA, Inc.

City-wide business disruption

If a disruption occurs in our city-wide area that affects our main office located at 1270 Avenue of the Americas, Suite 1910, New York, NY 10020-1700, we will reroute incoming telephone calls to individual cell phones of our Firm personnel. Firm personnel will be directed to proceed to an alternate location or locations. These locations shall be outside the city-wide area and may include home offices of key personnel.

Regional disruption

If a regional disruption occurs that affects our main and unregistered offices, we will reroute incoming telephone calls to individual cell phones of our Firm personnel. Firm personnel will be directed to proceed to an alternate location or locations and may include home offices of key personnel.

The Firm has also contracted with various entities to insure that sensitive information is made redundant at back-up facilities. However, due to the nature of such information we do not disclose the specific location of any back-up facilities, any proprietary information contained in our Business Continuity Plan or the parties with whom we have back-up arrangements.

Please call us should you have any questions.

Thank you,

DocuSigned by:

690570BB04F49E1
Steve Schlemmer
CCO
Churchill Capital USA, Inc.