

FletcherBennett

PRIVACY POLICY

FletcherBennett is committed to protecting your personal information. Privacy and security are fundamental elements of our commitment to our clients. We do not disclose any nonpublic personal information about current or former clients to anyone, except as permitted by law.

We are committed to protecting your privacy at all times. Moreover, we do not share your personal information with outside companies for purposes of selling their products and services to you.

Additionally, we collect nonpublic personal information about you, which may include, but is not limited to information we receive from you to open an account (such as your name, address, telephone number, birth date, social security number, and financial information) and information we generate or receive from brokerage firms, clearing firms, and other third parties to service your account (such as trade tickets, brokerage trade confirmations and account statements, investment holdings, quarterly reports, and other portfolio reports).

Except for disclosure that may be required by applicable law, FletcherBennett shall maintain the strictest confidence regarding the affairs of our clients. During the normal course of business operations some situations may arise which may require us to share information. Some examples are: (i) when protecting against or preventing fraud; (ii) in resolving customer disputes; (iii) in dealings with FletcherBennett's attorneys or auditors; (iv) when requested by a consumer reporting agency in accordance with other applicable law; and (v) when complying with applicable law, such as a valid subpoena.

We restrict access to your personal information to designated personnel that manage and service your account. All confidential information is protected against unauthorized access to ensure the security of customer information. Client information in paper form is kept in a locked and secure place with limited access. We maintain physical, electronic, and procedural safeguards to protect your nonpublic, personal information.

We may share information about you with our affiliates as permitted by law, such as information about your transactions or experiences with us, our affiliates, or others.

FletcherBennett will only share non-public customer information with outside entities in order to help administrate our business and/or provide you with specialized services. We may disclose information to the following types of companies: (i) financial institutions that would serve as the custodian of your assets; (ii) independent contractors who program our software to help provide you protection and additional services; (iii) service providers we hire to help administrate our business; and (iv) service providers to whom you direct us to share information.

Companies we hire for services of this kind are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of your personal information to the performance of the specific service we have requested.

For additional information please call us at 212-521-1140 or go www.fletcher-bennett.com.