

**MCCOMSEY ASSET MANAGEMENT, LLC
PRIVACY POLICY AND USA PATRIOT ACT NOTICE**

Our Commitment:

- We are committed to protecting your privacy at all times.
- We do not share your personal information with outside companies for purposes of selling their products and services to you.
- We maintain the highest security standards and procedures designed to protect your personal information.

McComsey Asset Management, LLC ("MAM") 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 collect nonpublic personal information about you, which may include, but is not limited to:

- Information from forms that clients may fill out and send to MAM in connection with opening a separately managed account (such as name, address, and social security number).
- Information a client may give MAM orally.
- Information about the amount clients have invested with MAM.
- Information about any bank account clients may use for transfers between a bank account and a client account managed by MAM.

Except for disclosure that may be required by applicable law, MAM 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:

- When protecting against or preventing fraud;
- In resolving customer disputes;
- In dealings with MAM's attorneys or auditors;
- When requested by a consumer reporting agency in accordance with other applicable law; and
- When complying with applicable law, such as a valid subpoena

This provision shall not prohibit MAM from including a client's account performance in relevant composites or reports.

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. Our physical, electronic, and procedural safeguards comply with federal regulations regarding the protection of customer information.

MAM will only share non-public customer information with outside entities in order to provide you with specialized services. We may disclose information to the following types of outside companies:

- Financial institutions that would serve as the custodian of your assets;
- Non-financial companies that prepare proxy mailings or account statements;
- Independent contractors who program our software to help provide you protection and additional services;
- Service providers to whom you direct us to share information, such as your CPA or legal counsel.

We require outside non-affiliated companies and independent contractors with whom we share information to enter into a confidentiality agreement that restricts the use of the information we will provide to them. We do not share customer information with outside companies for the purpose of marketing non-financial products or services of those companies.

MAM is committed to protecting your privacy and providing you with the services and information that you need to succeed financially. A copy of MAM's Privacy Policy is attached hereto as **Exhibit A**.

USA Patriot Act/Anti-Money Laundering Practices

Under new rules required by the USA PATRIOT ACT (the "Act"), we may ask you to provide various identification documents or other information in order to verify your identity. Until you provide the information we need, we may not be able to open an account or effect any transactions for you. The Act was designed to detect, deter and punish terrorists in the United States and abroad and consequently imposes new anti-money laundering requirements on financial institutions. These requirements necessitate our obtaining such identification documents from you.

MCCOMSEY ASSET MANAGEMENT, LLC

Privacy Policy

Maintaining the confidentiality of client personal financial information is very important to McComsey Asset Management ("MAM"). To provide clients with superior service, MAM may collect several types of nonpublic personal information about clients, including:

- Information from forms that clients may fill out and send to MAM in connection with opening a separately managed account (such as name, address, and social security number).
- Information a client may give MAM orally.
- Information about the amount clients have invested with MAM.
- Information about any bank account clients may use for transfers between a bank account and a client account managed by MAM.

MAM does not sell or disclose client personal information to anyone except as permitted or required by law. For example, MAM may share this information with MAM's legal counsel as we deem appropriate and with regulators. Finally, MAM may disclose information about clients at the client's request (for example, by sending duplicate account statements to someone designated by the client), or as otherwise permitted or required by law.

Within MAM, access to information about clients is restricted to those employees who need to know the information to service client accounts. MAM employees are trained to follow our procedures to protect client privacy and are instructed to access information about clients only when they have a business reason to obtain it.

MAM reserves the right to change its privacy policy in the future, but MAM will not disclose client nonpublic personal information as required or permitted by law without giving the client an opportunity to instruct MAM not to.