

Preserving trust is a core value. We recognize that you expect us to protect the information you provide us and to use it responsibly. We are strongly committed to fulfilling the trust that is the foundation of your expectations. For that reason, we have adopted and adhere to the following policy regarding the privacy of your nonpublic personal information and personally identifiable information (collectively "Nonpublic Personal Information").

A. INFORMATION THAT WE COLLECT

We may collect Nonpublic Personal Information from you or others, including your name, address, e-mail address, telephone numbers, Social Security Number, other information that permits us to contact or communicate with you, information about your financial situation including your employment or occupation, salary, assets, insurance and investment transactions, banking information, and other financial and tax information you may elect to supply to us.

B. HOW WE COLLECT INFORMATION

We collect this Nonpublic Personal Information through various sources, including:

- Information we receive from you on new account forms, fact-finding questionnaires, product and service applications, and other forms;
- Information we receive from you, in writing, electronically, through the telephone, or through our website, when you communicate with us, or request information about our products and services;
- Your transactions with us, our affiliates, and those product sponsors with whom we have selling agreements or other arrangements for the provision of services to you;
- Affiliated and unaffiliated product sponsors with whom we have selling relationships and whose products you own.

C. INFORMATION THAT WE DISCLOSE

As permitted by law and as outlined in this policy, we disclose Nonpublic Personal Information to affiliates and unaffiliated third parties that provide services to us or with whom we have contractual relationships in order that we may carry out your directions and effectively and efficiently service your account.

Examples of third parties with whom we may share your Nonpublic Personal Information include:

- Mutual fund companies and other product sponsors in order to execute your investment purchases and sales and to allow for the servicing of your accounts;
- Clearing Agencies or other broker/dealers through whom we clear and settle your securities transactions;
- Companies providing account performance and/or reporting services on your accounts;
- Third party asset managers with whom we have relationships for the management of customer accounts;
- Companies that provide services to us to assist with the maintenance of required books and records or to facilitate client mailings or publications on our behalf;
- State, Federal, and other regulatory and self-regulatory authorities as required by law or regulation;
- Other companies, associations, agencies, third parties, and institutions that provide services to us in order that we may more effectively and efficiently service your account.

Where we share your Nonpublic Personal Information with third parties for the purposes noted above, we ensure that there are contractual agreements with the third party prohibiting their use and disclosure of that information for any purpose other than to carry out the purposes for which you disclosed the information or that such third party is prohibited by law from further sharing your information (such as regulators). Except under the circumstances outlined above, we will not share Nonpublic Personal Information with affiliated or unaffiliated third parties concerning our current or former customers for marketing purposes or otherwise.

D. STEPS WE TAKE TO PROTECT YOUR INFORMATION

We have security policies and procedures reasonably designed to prevent unauthorized use or access to your Nonpublic Personal Information. In addition to your Adviser and his or her office, your information is available to employees for various business purposes, such as processing or servicing transactions, and those fulfilling compliance, legal or audit functions. Our computer systems utilize password protection to prevent access by unauthorized personnel, and we employ other physical, electronic, and procedural safeguards to ensure the protection of your Nonpublic Personal.

E. AMENDMENTS TO OUR PRIVACY POLICY

When we make material amendments to our Privacy Policy we will post an appropriate notice on our website. In addition we may send you an amended version of our Privacy Policy through the mail.