

PRIVACY POLICY

This privacy policy explains the manner in which the Financial Investments Inc. Family (FII) collects, utilizes and maintains nonpublic personal information about FII's clients, as required under recently enacted federal legislation. This privacy policy only applies to nonpublic information of clients who are individuals (not entities).

Collection of Investor Information

FII collects personal information about its clients mainly through the following sources:

- subscription forms, client questionnaires and other information provided by the client in writing, in person, by telephone, facsimile, electronic mail or by any other means. This information includes name, address, nationality, tax identification number, and financial and investment qualifications; and
- transactions within FII, including account balances, investments and withdrawals.

Disclosure of Nonpublic Personal Information

FII does not sell or rent client information. FII does not disclose nonpublic personal information about its clients to nonaffiliated third parties or to affiliated entities, except as permitted by law. For example, FII may share nonpublic personal information in the following situations:

- to service providers in connection with the administration and servicing of FII, which may include attorneys, accountants, auditors and other professionals. FII may also share information in connection with the servicing or processing of FII transactions;
- to affiliated companies in order to provide accounts with ongoing personal advice and assistance to provide products and services that may be of value to accounts;
- to respond to a subpoena or court order, judicial process or regulatory authorities;
- to protect against fraud, unauthorized transactions (such as money laundering), claims or other liabilities; and
- upon consent of a client to release such information, including authorization to disclose such information to persons acting in a fiduciary or representative capacity on behalf of the client.

Protection of Investor Information

FII's policy is to require that all employees, financial professionals and companies providing services on its behalf keep client information confidential.

FII maintains safeguards that comply with federal standards to protect client information. FII restricts access to the personal and account information of clients to those employees who need to know that information in the course of their job responsibilities. Third parties with whom FII shares client information must agree to follow appropriate standards of security and confidentiality.

FII's privacy policy applies to both current and former clients. FII may disclose nonpublic personal information about a former client to the same extent as for a current client.

Changes to Privacy Policy

FII may make changes to its privacy policy in the future. FII will not make any change affecting accounts without first sending account holders a revised privacy policy describing the change. In any case, FII will send account holders a current privacy policy at least once a year as long as the account holders continue to be a client of FII.