

NOTICE OF PRIVACY POLICY AND PRACTICES

SummitAlliance Capital Management (“SACM”) recognizes and respects the privacy expectations of our customers¹ and is committed to safeguarding our customers’ nonpublic personal information. We are providing this notice to you so that you will know what types of information we collect about individuals, such as yourself, who apply for or obtain our products or services, how we handle and protect such information, and the circumstances in which that information will be disclosed to third parties who are not affiliated with us. The provisions of this notice apply to former customers as well as current customers.

INFORMATION WE COLLECT

We collect nonpublic personal information about you for business purposes in connection with our investment management operations. Such information is collected from the following sources:

- *Account Opening Documents and Other Forms*, which may include information such as your name, address, social security number, income information, net worth, investment experience, educational background and banking information;
- *Account History*, such as information regarding the assets in your account and your account’s transactions, including the parties to a transaction, the positions held or sold, and pricing; and
- *Correspondence*, written, telephonic or electronic between you, us and/or any service providers for your account.

“Nonpublic personal information” is nonpublic information about you that we obtain in connection with providing you with a financial product or service for your personal, family, or household purposes.

INFORMATION DISCLOSURE TO THIRD PARTIES

We do not disclose any nonpublic personal information about you to non-affiliated third parties, except to service providers and as otherwise permitted by law. We do not sell any personal information about you to any third party.

In the normal course of business, all of the nonpublic personal information we collect about you, as described above, may be shared with other persons who provide services in connection with your account (including brokers, administrators, custodians, accountants or attorneys, as well as any other service providers for your account).

We may also disclose personal information with non-affiliated entities and regulatory authorities as permitted by applicable law. For example, we may disclose such information to cooperate with regulatory authorities and law enforcement agencies and as necessary to protect our rights and property.

Should we dispose of any personal credit reports or personal non-public information we may obtain, we ensure that it is completely destroyed before disposal.

PROTECTING CONFIDENTIALITY AND SECURITY

We maintain physical, electronic, and procedural safeguards to protect the nonpublic personal information we have about you. We treat this information in a confidential manner. We restrict access to

¹ For purposes of this notice, the terms “customer” or “customers” includes both clients of ours and individuals who have provided us with non-public personal information but have not become our clients.

nonpublic information about you to employees who have an appropriate reason to access it, such as to administer your account or offer our products and services. We educate our employees on the importance of protecting the privacy and security of confidential personal information. In addition, third parties with whom we share information are required to:

- maintain policies and procedures designed to assure only appropriate access to, and use of information about, our customers; and
- maintain physical, electronic and procedural safeguards that comply with federal standards to guard nonpublic information of our customers.

If you have any questions or concerns about your Personal Information or this privacy notice, or to receive additional information concerning SACM privacy policies and procedures, please contact, SummitAlliance Capital Management, Inc. 14785 Preston Road, Suite 1000, Dallas, TX 75254; phone: 972-663-4300 facsimile: 972-663-4301.