

TRUST MANAGEMENT NETWORK INFORMATION SECURITY AND PRIVACY POLICY

GENERAL STATEMENT

To serve its Clients, Trust Management Network, LLC (“TMN”) maintains a written contractual agreement, the Data Processing and Custodial Services Agreement (“Agreement”), which outlines the terms of services being offered by TMN. Contractual language in that Agreement states that TMN will hold all information concerning Client customers and their nonpublic personal financial information in strict confidence in accordance with all laws and regulations protecting the privacy of such customers. The Agreement also indicates that TMN will take appropriate steps to insure it holds such information in confidence and that such information shall not be divulged to any third party or used by TMN in any manner except for the purposes of performing its services under the Agreement.

With increased networking and a growing realization of how valuable information assets are, TMN recognizes that information security an important issue. To promote compliance with Section 505(a) of the Gramm Leach Bliley Act, TMN will institute commercially reasonable steps to protect the security and confidentiality of its Clients’ customer information and to protect against unauthorized access to or use of such information that could result in substantial harm or inconvenience to the Client or its customer.

TMN will not disclose, sell, rent or share its Clients’ nonpublic, personal customer financial information to any third-party. TMN does not disclose nor reserve the right to disclose nonpublic personal information about your customers or former customers to affiliates or nonaffiliates, except as permitted or required by law. For example, information to third parties may be disclosed when it is necessary to process a transaction you have instructed us to complete or maintain.

TMN further agrees to keep all such Confidential Information physically and electronically secured and protected from accidental disclosure or security breaches by unauthorized parties. If a security breach does take place and Client information is inappropriately accessed by an unauthorized party, TMN will promptly notify the Client of such breach and provide the necessary information to assist the Client with evaluating the breach or unauthorized disclosure of Confidential Information. TMN will notify the Client when the intrusion occurred, the projected effect on the Client, and TMN’s corrective action to respond to the intrusion. TMN reserves the right to change security procedures and Client access requirements to promote a secure information database environment.

When Client customer information is to be destroyed, TMN agrees to maintain appropriate security controls over their disposal or destruction of such information so as to not allow such information to be recoverable or retrieved by unauthorized parties.