



PRIVACY POLICY

Overview:

Emerald Asset Advisors and its affiliated companies, (together, "Emerald"), treat our clients; non-public personal financial information with confidentiality and respect. Trust, privacy, and confidentiality are the guiding principles upon which the Emerald relationship with clients is built and form the basis for our Privacy Policy. Emerald protects personal information by maintaining procedural safeguards that meet or exceed the applicable legal requirements found in the Gramm-Leach-Bliley Act and those of the SEC. Emerald's Privacy Policy is reasonably designed to:

1. Insure the security and confidentiality of clients' records and information;
2. Protect against anticipated threats or hazards to the security or integrity of client records and information; and
3. Protect against unauthorized access to or use of client records or information that could result in substantial harm or inconvenience to clients.

Responsibility to Protect Nonpublic, Personal Information:

Emerald employees are informed of their responsibility to protect client confidential information and are bound by this Privacy Policy. We restrict access to clients' nonpublic, personal information to those employees who need to know that information to provide Emerald's products or services.

Nonpublic, personal information is defined to include all information a client provides to obtain a financial product or service, or information resulting from any transaction or information otherwise obtained in providing a financial product or service, but does not include publicly available information except when such information is disclosed in a manner that indicates an individual is or has been a client of the financial institution.

Privacy On The Internet:

Emerald is firmly committed to maintaining our clients' privacy in the Internet world.

If clients choose to contact Emerald via e-mail, we will use e-mail information only for the specific purpose of responding to requests or comments. E-mail addresses will not be sold, nor will they be shared with others outside of Emerald, unless we are compelled to do so by law.

Emerald collects nonpublic, personal information about you from the following sources:

We will limit the use and collection of information about clients to the extent necessary to administer our business, provide superior service and offer opportunities that we think will be in our clients' best interest. Generally, we will collect the following:

Information we receive from clients on forms or through discussion, including but not limited to, a client's name, social security number, date of birth, mailing address, legal address, home phone number, business phone number, fax number, country of citizenship, occupation, place of employment, annual household income, net worth, tax bracket, investment experience, investment objectives, income

needs, risk attitude, consultant information, and various information about a client's spouse and immediate family; and

Information about a client we gather from a client's transactions with us, or affiliates, or other, including, but not limited to, your account balances, transactions reports, and parties to transactions.

Sharing Information:

Emerald Asset Advisors does not sell lists of client information. We do not disclose client information to marketing companies, unless we hire them to provide specific services as listed below. We do not disclose any of the information described above, except as provided by law. Emerald may share non-public personal information with our affiliates in the course of processing transactions, managing accounts on your behalf, or to inform you of products or services that we believe may be of interest to you. Additionally, we may share non-public personal information with the following types of third parties:

1. Our financial service providers such as custodians, transfer agents and third party money managers; and
2. Non-financial companies under servicing or joint marketing agreements, such as printing firms and mailing firms.

These third parties are bound by law or by contract to use your information only for the services for which we hired them, and are not permitted to use or share this information for any other purpose.

Your Right to Opt Out

Emerald Asset Advisors reserves the right to change this policy. If this policy were to be changed, you would be notified and provided an opportunity to opt out of our disclosing that information.

Sharing Information With The Government:

The Right to Financial Privacy Act, the Welfare Reform Act, the Internal Revenue Code and various other laws and regulations sometimes require us or our contractors, under certain circumstances, to provide certain client information to government agencies. We will only disclose client information to the government or others when we are required to do so by such laws, regulations or by court order. Certain state and federal laws, with which Emerald must comply, impose certain mandatory disclosures of client information by financial institutions.

Sharing Information With Third Party Litigants:

If a client is involved in a legal proceeding, both federal and state law provide parties to the litigation the right to compel the production of records and information from banks and other third party record keepers in certain situations. We will only disclose client information to third party litigants when we are required to do so by lawful judicial process or by court order.

Former Customers:

We do not disclose any nonpublic, personal information about our former clients or customers to anyone, except as required by law.

Please Note:

Emerald reserves the right to change this policy at any time by distributing and/or posting a new privacy policy without notice. You should review the Emerald Privacy Policy periodically to remain informed of any changes.

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