

PRIVACY POLICY

TO OUR CLIENTS:

Protecting the privacy of your information is nothing new to us. We have in the past and will continue in the future to protect your right to privacy. As a general rule, we do not disclose nonpublic personal information about our clients or former clients to anyone that is not affiliated with us without the client's consent.

TYPES OF "NONPUBLIC PERSONAL INFORMATION" WE COLLECT

In the course of our investment activities on your behalf, we may collect nonpublic personal information from you, such as your name and social security number, from documents that you deliver to us or from our discussions with you.

PERSONS TO WHOM WE DISCLOSE INFORMATION

As stated previously, we generally do not disclose any nonpublic personal information about our current or former clients that we obtain during the course of our relationship to unaffiliated third parties, except as permitted by law. However, in order to conduct investment activities on your behalf, in limited situations we may need to disclose this nonpublic personal information to unrelated third parties (for example, third party managers, auditors, qualified custodians or the Internal Revenue Service). Your authorization for us to conduct investment activities on your behalf and your continuing relationship with us acts as your consent to our disclosure of your nonpublic personal information when such disclosure is necessary to conduct such activities.

Your nonpublic personal information may also be shared with our attorneys, accountants, third-party service providers and auditors. In all such situations, we take steps necessary to ensure that the confidential nature of the information being shared is maintained.

PROTECTING THE CONFIDENTIALITY AND SECURITY OF CURRENT AND FORMER CLIENTS' INFORMATION

In order to protect your information, we also maintain physical, electronic, and procedural safeguards that comply with federal regulations to guard your nonpublic personal information.

If you have any questions about our privacy policies, please contact Abel Ramirez, our Chief Compliance Officer at 214-909-2235, because your privacy and the confidentiality of your information are very important to us.

