

PRIVACY POLICY DISCLOSURE

Commitment to Protect Your Private Information. Mulvihill Asset Management, LLC® (MAM), its Investment Advisor Representatives (IARs), and its associates are committed to safeguarding Client confidential information. MAM holds all nonpublic information (NPI) provided by Clients in the strictest confidence.

Why We Collect and How We Use Information. To conduct regular business, administer, manage, service, and provide related services for Client accounts, it is necessary for MAM to collect and provide access to Client information within the firm and to nonaffiliated companies with whom MAM has entered into agreements. To provide the utmost level of service, MAM will collect and disclose the information below regarding Clients and former Clients, as necessary, to companies to perform certain services on MAM's behalf.

- Information MAM receives from the Client on applications and through meetings (name, social security number, address, assets, beneficiaries, etc.)
- Information about the Client's transactions with MAM or others (account information, payment history, parties to transactions, etc.)
- Information concerning account transactions and funds transfers.
- Information about a Client's securities holdings with MAM.

Client Identity Verification. Under the USA PATRIOT ACT, Mulvihill Asset Management, LLC® (MAM) is obligated to verify the identity of each Client opening a new account. We will ask for your name, address, date of birth, and other personal information that will allow us to identify you, including obtaining copies of your driver's license or other identifying documents. PLEASE UNDERSTAND that if we are unable to verify the identity of all the owners of any account within a reasonable time, we may, at any time, at our sole discretion, without providing advance notice, close the account.

Sharing Information with Other Companies Permitted or Required Under Law. Mulvihill Asset Management, LLC® (MAM) shares NPI to service Client accounts. MAM may also provide Client information outside of the firm as permitted or required by law.

- MAM will disclose NPI to non-affiliated investment advisers, brokers and other agents, including Charles Schwab and other custodians as authorized by the Client, investment advisor firms that are owned and operated by MAM IARs, and other firms with which MAM has contracted, to provide services, process transactions and service Client accounts.
- MAM may also provide your information to vendors providing data processing; computer software maintenance and development; compliance and legal consulting; and other general business support services. These vendors are required to sign a nondisclosure agreement agreeing to maintain the confidentiality of all NPI.
- MAM may also disclose NPI if we believe in good faith that such disclosure is required to comply with applicable laws, such as cooperating with regulators, consumer reporting agencies or to resolve consumer disputes.

Disclosure of Information to Your MAM Investment Advisor Representative. MAM recognizes that you have elected to open accounts with us due to the efforts of your MAM IAR. If your IAR elects to leave MAM for another registered investment advisor, MAM will allow the IAR to take your information to the new firm, subject to the requirements or limitations of applicable law.

Opt Out Provision

If at any time a Client does not wish to have any of his/her/its NPI disclosed to a third party, the Client shall telephone MAM's CCO at (972) 267-1244 to notify him/her of such decision. Email, voicemail or fax notice is not sufficient. The CCO shall hold a live voice conversation with the Client. The CCO shall keep a list of any Client who opts out of disclosure and will consult such list prior to disseminating any Client NPI to a third party.

Former Clients. Even if we cease to provide you with financial products or services, our Privacy Policy will continue to apply to you and we will continue to treat your nonpublic information with strict confidentiality. Regulations require MAM to retain your Client records for a minimum period of five years following the last account activity.