

PRIVACY POLICY NOTICE

July 1, 2011

Maintaining your trust and confidence is a high priority. We recognize that protecting the privacy and security of our customers is an important responsibility. That's why we want you to understand how we protect your privacy when we collect and use information about you, and the steps that we take to safeguard that information.

TRIBECA FINANCIAL, LLC PRIVACY POLICY

We have adopted this policy with recognition that protecting the privacy and security of the personal information we obtain about our customers is an important responsibility. We also know that you expect us to service you in an accurate and efficient manner. To do so, we must collect and maintain certain personal information about you. We want you to know what information we collect and how we use and safeguard that information.

What Information We Collect

We collect certain nonpublic personal identifying information about you (such as your name, address, social security number, etc.) from information that you provide on applications or other forms as well as communications (electronic, telephone, written or in person) with you or your authorized representatives (such as your attorney, accountant, etc.). We also collect information about your brokerage accounts and transactions (such as purchases, sales, account balances, inquiries, etc.).

What Information We Disclose

We do not disclose the nonpublic personal information we collect about you to anyone except in furtherance of our business relationship with you and then only to those persons necessary to effect the transactions and provide the services that you authorize (such as broker-dealers, custodians, independent managers etc.) or as otherwise provided by law.

We are permitted by law to disclose the nonpublic personal information about you to other third parties in certain circumstances (such as third parties that perform administrative or marketing services on our behalf or for joint marketing programs). These third parties are prohibited to use or share the information for any other purpose. If you decide at some point to either terminate our services or become an inactive customer, we will continue to adhere to our privacy policy, as may be amended from time to time.

Security of Your Information

We restrict access to your nonpublic personal information to those employees who need to know that information to service your account. We maintain physical, electronic and procedural safeguards that comply with applicable federal or state standards to protect your nonpublic personal information.

Changes to our Privacy Policy or Relationship With You

Our policy about obtaining and disclosing information may change from time to time. We will provide you notice of any material change to this policy before we implement the change.