

Notice of Privacy Policy

*This notice is being provided by **Kipande, Inc.**, because you are a client.*

We are committed to keeping the personal information collected from our potential, current and former clients confidential and secure. The proper handling of personal information is one of our highest priorities. We want to be sure that you know why we need to collect personal information from you. We also want to explain to you our commitment to protect the information you provide to us. We never sell your information to any outside parties.

Client Information

We collect and keep only information that is necessary for us to provide services requested by you and to administer your business with us. We may collect nonpublic personal information:

- From you when you complete an application, subscription documents or other forms. This includes information such as name, address, social security number, assets, income, net worth and other information deemed necessary to evaluate your financial needs.

We verify our clients' identity to actively prevent, deter, and detect illegal financial activity. As of July 2003, pursuant to the USA PATRIOT Act, all clients who open new accounts with Kipande, Inc. will be required to provide identification verification documents to help establish their identity. At a minimum, we will verify, to the extent reasonable and practicable, the identity of any client seeking to open an account, maintain records of information used to verify a client's identity, and check to ensure that a client does not appear on any published government terrorist lists.

Sharing Information

We only share your nonpublic personal information with non-affiliated companies or individuals as permitted by law, such as your representative within our firm and other product vendors, or to comply with legal or regulatory requirements. In the normal course of our business, we may disclose information we collect about you to companies or individuals that contract with us to perform servicing functions such as:

- Record keeping
- Computer related services
- Good faith disclosure to regulators who have regulatory authority over the company
- Companies we hire to provide support services are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of your personal information to the performance of the specific service we have requested. Companies we hire to provide support services are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of your personal information to the performance of the specific service we have requested.

We do not provide your personally identifiable information to mailing list vendors or solicitors for any purpose. When we provide personal information to a service provider, we require these providers to agree to safeguard your information, to use the information only for the intended purpose, and to abide by applicable law.

Opt Out Provisions

We do not sell your personal information to anyone.

The law allows you to “opt out” of only certain kinds of information-sharing with third parties. Kipande, Inc. does not share personal information about you with any third parties that triggers this opt-out right. This means **YOU ARE ALREADY OPTED OUT.**

Employee Access to Information

Only employees with a valid business reason have access to your personal information. These employees are educated on the importance of maintaining the confidentiality and security of this information. They are required to abide by our information handling practices.

Protection of Information

We maintain security standards to protect your information, whether written, spoken, or electronic. We update and test our systems to ensure the protection and integrity of information.

Disposal of Information

Periodically, it may be necessary to dispose of the information that you have provided. Kipande, Inc. takes measures to protect against unauthorized access to or use of your information in connection with its disposal.

Maintaining Accurate Information

Our goal is to maintain accurate, up-to-date client records in accordance with industry standards. We have procedures in place to keep information current and complete, including timely correction of inaccurate information.

E-Mail

Should you send us your questions and comments via e-mail to any mailbox provided by Kipande, Inc. we will share your correspondence with our Investment Advisors and those employees or agents most capable of addressing your questions and concerns. We will retain your communication until we have done our very best to provide you with a complete and satisfactory response. Ultimately, we will either discard your communication or archive it according to Kipande, Inc.’s requirements under applicable securities laws.

Please note that, unless we expressly advise you otherwise, Kipande, Inc.’s e-mail facilities do not provide a means for completely secure and private communications between Kipande, Inc. and you, the User. Although every attempt will be made to keep your information confidential, from a technical standpoint, there is still a risk. For that reason, please do not use e-mail to communicate information to us that you consider to be confidential. If you wish, you may contact us instead via telephone or by facsimile. Additional security is available to you if you equip your Internet browser with 128-bit “secure socket layer” encryption, which provides more secure transmissions.

Disclosure of our Privacy Policy

We recognize and respect the privacy concerns of our potential, current and former clients. We are committed to safeguarding this information. As a member of the financial services industry, we are sending you this Notice of Privacy Policy for informational purposes and will update and distribute it as required by law. It is also available upon request.