



CAPITALFIRST TRUST COMPANY

PRIVACY POLICY

Capital First Trust Company recognizes that as our client, you have the right to expect your nonpublic personal information to remain private and secure. We want you to know that maintaining the confidentiality of your personal information is a high priority to us. As financial service professionals entrusted with sensitive information, we respect the privacy of our clients and are committed to treating information responsibly.

Our staff feels that it is important that you be informed of the privacy policies we practice, as follows:

1. Specific security protection to ensure privacy information.
2. Control methods to limit access to client information.
3. Formal procedures and processes to ensure the maintenance of accurate information.
4. Procedures and restrictions on disclosure of client account information.
5. Standards for client data collection, use and method storage.
6. Client data privacy covenants in third-party service and/or business arrangements.
7. Staff commitment to support and to protect a client's right to data privacy.
8. Periodic disclosure to clients of privacy benchmarks and overview of institution privacy practices.

Our privacy policy is to serve as a reference and guide to clients, staff, and management with respect to protecting your client data and your privacy. In providing this privacy policy, we also want to underscore that despite our efforts to document or cover various situations in a written policy statement or notice, this notice is not designed to act as a substitute for sound risk analysis or good judgment by our staff.

We are required to provide you with this notice at the beginning of our relationship with you and annually thereafter. If for any reason our policy changes in the interim with respect to privacy-related matters, you will be informed.

We do not disclose any nonpublic information about our clients or former clients to anyone except as provided by law or as necessary to provide our products and services to our clients. When it comes to sharing client information with unaffiliated companies, Capital First Trust Company places strict limits on who receives specific information about client's accounts or other personal information. Information is shared with nonaffiliated companies when; they assist us in providing our products and services to our clients, when it is legally required or at the request and permission of a client.

Capital First Trust Company is committed to the security of your financial and personal information. We uphold physical, electronic and procedural safeguards to guard your nonpublic personal information. Our employees are educated on the importance of maintaining the confidentiality of client information and the consequences for violation of this policy. We want our clients to understand our commitment to privacy in our use of client information. Clients who have any questions about this privacy policy can contact our client service department at (800) 521-2359.