

NOTICE OF GKV CAPITAL MANAGEMENT CO., INC. CLIENT PRIVACY POLICY

Your Privacy is Protected

At GKV Capital Management Co., Inc., an important part of our commitment to you is our respect for your right to privacy. Protecting all the information we are either required to gather or which accumulates in the course of doing business with you is of the utmost importance to us.

Collection of Information

The primary reason that we collect and maintain information is to more effectively administer our client relationship with you. It allows us to provide efficient, accurate and responsive service to all your investment needs.

Various sources are used to collect information about you, including

- (i) information you provide to us at the time you establish a relationship; and
- (ii) information provided in applications, forms or instruction letters completed by you.

In order to maintain the integrity of client information, we have procedures in place to update such information, as well as to delete it when appropriate. We encourage you to communicate such changes whenever necessary.

How We Protect Information

Our employees, acting on your behalf, are required to protect the confidentiality of information and to comply with our established policies. They may access information only when there is an appropriate reason to do so, such as to administer or offer our services. We also maintain physical, electronic and procedural safeguards to protect information, which comply with all applicable laws. Employees who violate our Privacy Policy will be subject to disciplinary process.

Disclosure of Information

GKV Capital Management Company does not disclose any nonpublic, personal information (such as your name, address or identification number) about our clients or former clients to anyone, except as permitted or required by law. We maintain physical, electronic and procedural safeguards to protect such information, and limit access to such information to those employees who require it in order to provide services to you.

GKV Capital may disclose information to third parties in certain circumstances, including:

- To banks, brokerage firms, mutual funds and other entities that are involved with the services we offer or transactions requested by you or arrange on behalf of clients;
- When it is reasonably requested by a third party and authorized by client;
- To companies in which you hold securities (as defined in Rule 14b-1 under the Securities and Exchange Act of 1934), unless we receive your written objection; and
- If you give us your permission.

GKV Capital is committed to upholding this Privacy Policy. We will notify you on an annual basis of our policies and practices in this regard. If you have any questions regarding this matter we suggest that you call us. Upon your written request, we will make available for your review any file we maintain for your personal Information.

Our Former Clients

Even if you are no longer a GKV Capital client, our Privacy Policy will continue to apply to you.