



BALPOLE INVESTMENT MANAGEMENT CORPORATION

Privacy Notice

August 2007

The Graham-Leach-Bliley Act requires companies to adopt policies and procedures designed to ensure the confidentiality of customers “nonpublic” personal records and information; protect against any anticipated threats or hazards to the security of customer records and information; and protect against unauthorized access of customer records or information that could result in “substantial harm or inconvenience” to any customer.

Policy Statement

To deliver our customers quality service, Balopole Investment Management Corporation (BIMC) requires certain nonpublic customer information. It is essential that we properly manage and maintain that customer information.

The delivery of financial services is rapidly changing as new technologies are integrated into the way we deliver our services to our customers. To affirm our continued commitment to the proper use of customer information and protecting your privacy, we have set forth the following privacy policies.

Categories Of Information Collected

BIMC collects nonpublic personal information about our customers from the following sources: information we receive from you on applications, client questionnaires and other forms; information about your investment transactions with our affiliates and other professionals (financial service institutions, accountants, lawyers, mortgage brokers and others).

Disclosure Of Information

BIMC does not disclose nonpublic personal information to nonaffiliated third parties (such as brokerage firms or insurance companies) except as required by law or in carrying out the duties for which you have retained us. BIMC does not anticipate any change to this policy and, in the unlikely event that we are required to change it, we will contact you prior to such a change and provide you with a notice of your option to opt out of any release of nonpublic private information.

Disclosure of any nonpublic records of former customers will be handled under the same policy as current clients.



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Disclosure Of Customer Information And Protecting Your Confidentiality

BIMC limits access of nonpublic personal information to only those employees who have a business or professional reason for knowing it and only to nonaffiliated third parties as permitted by law. For example, federal regulations permit us to share a limited amount of information with brokerage firms in order to transact business on your behalf. Federal and state regulators, in the course of auditing our firm, may have access to your data. We maintain physical, electronic and procedural safeguards that comply with federal standards to guard your nonpublic personal information.

If we provide personal identifiable customer information to a third party with which we have a business relationship, we will instruct the third party to keep such information confidential, consistent with the conduct of our business relationship. Such activities will require your prior notification and authorization.

Our Commitment

The safeguarding of nonpublic customer information is an issue BIMC takes seriously. We want to ensure that our customers know that we are committed to maintaining the confidentiality, integrity and security of your personal information.

We have developed these privacy procedures to protect our customers and we reserve the right to change these policies and procedures at any time without prior notice. These policies are for general reference and do not constitute a contract or create legal rights and do not modify or amend any agreement BIMC has with our customers.

At BIMC, we want our customers to understand our commitment to their privacy and our use of customer information. If you have any further questions please feel free to contact us at 650-574-1307.