

KINGDOMTRUST CAPITAL MANAGEMENT, INC.

PRIVACY POLICY

We are committed to protecting our clients' privacy. KingdomTrust Capital Management, Inc. maintains the following privacy policy:

What We Do To Protect Your Personal Information

We protect personal information provided to us by our clients according to strict standards of security and confidentiality. These standards apply to both our physical facilities and any online services we may provide. We maintain physical, electronic and procedural safeguards to protect consumer information and regularly review and update our systems to keep them current. We permit only authorized individuals, who are trained in the proper handling of client information and who need to know this information to do their jobs, to have access to this information.

Personal Information that we collect and may disclose as part of providing our clients with investment products or services, we may obtain the following types of nonpublic personal information about our clients:

Information we receive from our clients on applications or other forms, such as your name, address, telephone number, social security number, occupation, assets and income; information about account balance and activity; and information from public records we may access in the ordinary course of business.

When We May Disclose Your Personal Information to Unaffiliated Third Parties

We will not share our clients' personal information collected, as described above, with unaffiliated third parties except:

At our clients' request; when our clients authorize us to process or service a transaction, for example in connection with a purchase or sale of securities (unaffiliated third parties in this instance may include service providers such as a custodian, data processor or printer);

With companies that perform marketing services on our behalf or to other financial institutions with whom we have joint marketing agreements and who agree to use the information only for the purposes for which we disclose such information to them; or when required by law to disclose such information to appropriate authorities.

We do not otherwise provide information about our clients to outside firms, organizations or individuals except to our attorneys, accountants and auditors and as permitted by law. We never sell information about our clients or our clients' accounts.

What We Do With Personal Information about Our Former Clients

If a client decides to no longer do business with us, we will continue to follow this privacy policy with respect to the information we have in our possession about that client and the client's account.

This policy applies to: KingdomTrust Capital Management, Inc.

Guiding Principles

The relationship between KingdomTrust Capital Management, Inc. and our clients is the most important asset of our firm. We strive to maintain your trust and confidence in our firm, an essential aspect of which is our commitment to protect your personal information to the best of our ability. We believe that all of our clients value their privacy, so we will not disclose your personal information to anyone unless it is required by law, at your direction, or is necessary to provide you with our services. We continue to apply the same privacy policies and practice to our former clients that we do to our existing clients. We have not and will not sell or give your personal information to anyone.

This privacy policy applies to all consumers who have a relationship with KingdomTrust Capital Management, Inc. Our privacy policy is subject to change. In the event that changes occur, you will be informed in accordance with applicable laws. Additionally, you will be provided with our privacy policy annually. For purposes of this policy, a customer is defined as a natural person, or that person's legal representative, who obtains or has obtained any financial product or service from us that is used primarily for personal, family or household purposes, and customer information means personally identifiable information about a consumer who has a relationship with KingdomTrust Capital Management, Inc.

Accordingly, at KingdomTrust Capital Management, Inc. we have adopted the following: Customer information security and confidentiality.

We take a number of steps to ensure that customer information is adequately safeguarded. These steps include the following:

1. Implementing a number of physical and electronic security features to prevent unauthorized access;
2. Limiting employee access to customer information; and,
3. Conducting periodic reviews of our computer systems, including security features.

How We Collect Customer Information

Additionally, our employees are required to acknowledge their responsibility to maintain the confidentiality of customer information.

KingdomTrust Capital Management, Inc. collects and maintains your personal information so we can provide investment management services to you. The types and categories of information we collect and maintain about you include:

Information we receive from you to open an account or provide investment advice to you (such as your home address, telephone number, and financial information); Information that we generate to service your account (such as trade tickets and account statements);

Information that we may receive from third parties with respect to your account (such as trade confirmations from brokerage firms), including information that we may receive about you from our affiliated companies.

How we disclose customer information

In order for KingdomTrust Capital Management, Inc. to provide investment management services to you, we may disclose the information we collect, as described above, in very limited instances, which include:

Disclosures to companies - subject to strict confidentiality agreements - that perform services on our behalf (such as our technology consultants who assist us in maintaining our computer systems);

Disclosures to companies and Affiliates as permitted by law, including those necessary to service your account and relationship (such as providing account information to brokers and custodians); Disclosures to our Affiliates only in accordance with the Fair Credit Reporting Act; to comply with law, regulation, or a court or government order or request; If you or any authorized person on the account gives us oral or written permission to do so and in response to a request by an auditor or SEC examiner.