Important privacy information for customers of SCF.

SCF Securities, Inc. and SCF Investment Advisors, Inc. ("SCF") considers the privacy of its customers or former customers to be a matter of the utmost importance. We believe that any personal customer data provided to us should be treated with the highest level of regard for the confidentiality of personal and financial information.

This Privacy Policy will explain the types of information we collect about you, how we use and share that information and how you can instruct us to limit certain types of information sharing. Privacy notices are only required when disclosure policies change after the relationship begins, and to the extent an institution shares sensitive personal information with third parties for marketing purposes.

1. PERSONAL INFORMATION

We collect non-public, personal information provided on forms and applications and through electronic media for some individual customers, including but not limited to: your name, address, social security number, marital status, employment, assets and income. We will not sell your personal information. In addition, we will not give or share your personal information with any unaffiliated third party. The law permits us to share information about our current and former customers with government agencies or other authorized third parties under certain circumstances. For example, we may be required to produce such information in response to subpoenas or in compliance with certain laws. We may disclose the information we collect to companies that perform administrative or marketing services on our behalf, product sponsor companies, parent company and subsidiaries, custodians, certain third-party data management providers, transfer agents, data protection servicer, and when it is required by law to regulatory or law enforcement authorities. As stated in our agreements, these companies will use this information only for the services for which we have specified, and are contractually obligated not to use or share this information for any other purpose.

2. INFORMATION SHARING

SCF is affiliated with such companies as SCF Investment Advisors and SCF Marketing, Inc. SCF is a wholly owned subsidiary of SCF Holdings, Inc.

FACTS What Does SCF Securities Do with Your Personal Information?

Why? Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share and protect your personal information. Please read this notice carefully to understand what we do.

What? The types of personal information we collect can include:

- Social Security number
- Income
- Assets
- Investment experience
- Account transactions
- Retirement assets

When you are no longer our customer, we will continue to hold your information and share it as described in this notice.

How? All financial companies need to share customers’ personal information to run their everyday business. In the section below, we list the reasons why financial companies can share their customers’ personal information, the reasons SCF chooses to share personal information and whether you can limit this sharing.
Who We Are

Who is providing this notice? SCF Securities, Inc. and its affiliates (collectively, SCF). Our affiliates include the following:

- SCF Securities
- SCF Marketing
- SCF Investment Advisors

SCF shares information we collect about you with our affiliated companies to:

- Help provide you with better service or perform services on your behalf;
- Make it more convenient for you to open a new account, process servicing needs, etc.;
- Allow an affiliated company to provide you with the information about their products or services that may be of benefit or interest to you.

If your financial advisor terminates his or her relationship with us and moves to another brokerage or investment advisory firm, we or your financial advisor may disclose certain personal information to the new firm, unless you instruct us not to. If you do not want us or your financial advisor to disclose your personal information to the new firm, and if you do not want your financial advisor to retain copies of your personal information when your financial advisor terminates his or her relationship with us, you may request that we and/or your financial advisor limit the information that is shared with the new firm by contacting: SCF Securities, Inc., Attn: Compliance Department, 155 E. Shaw Ave, Suite 102, Fresno, CA 93710.

<table>
<thead>
<tr>
<th>Reasons We Can Share Your Personal Information</th>
<th>Does SCF Share?</th>
<th>Can You Limit This Sharing?</th>
</tr>
</thead>
<tbody>
<tr>
<td>For our everyday business purposes, such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>For our marketing purposes to offer our products and services to you</td>
<td>No</td>
<td>We Don’t share</td>
</tr>
<tr>
<td>For joint marketing with other financial companies</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>For our affiliates’ everyday business purposes—information about your transactions and experiences</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>For our affiliates’ everyday business purposes—information about your creditworthiness</td>
<td>No</td>
<td>We Don’t share</td>
</tr>
<tr>
<td>For non-affiliates to market to you—for clients with accounts established with SCF representatives at banks or credit unions</td>
<td>No</td>
<td>We Don’t share</td>
</tr>
</tbody>
</table>

3. SECURITY AND EMPLOYEE ACCESS TO INFORMATION

SCF Securities, Inc. maintains physical, electronic and procedural safeguards to protect confidential customer information. SCF takes precautions to ensure the information we collect about you is protected and is accessed only by authorized individuals or organization. Our employees are trained about privacy and are required to safeguard confidential customer information.
What We Do

How does SCF protect my personal information? To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.

How does SCF collect my personal information? We collect your personal information, for example, when you:

- Open an account
- Apply for insurance
- Enter into an investment advisory account
- Tell us about your investment or retirement portfolio
- Seek advice about your investments

We do not collect your personal information from others such as credit bureaus, affiliates or other companies.

Why can’t I limit all sharing? Federal law gives you the right to limit only:

- Sharing for affiliates’ everyday business purposes—information about your creditworthiness
- Affiliates from using your information to market to you
- Sharing for non-affiliates to market to you

State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.

Definitions

Affiliates Companies related by common ownership or control. They can be financial and non-financial companies.

Our affiliates include companies with an SCF Securities name; financial companies such as SCF Securities, SCF Marketing and SCF Investment Advisors.

Non-Affiliates Companies not related by common ownership or control. They can be financial and non-financial companies.

SCF Securities does not share with non-affiliates so they can market to you.

4. MUNICIPAL SECURITIES RULEMAKING BOARD (MSRB)

SCF Securities, Inc. is registered with the U.S. Securities Commission and the Municipal Securities Rulemaking Board.

An investor brochure that describes the protections that may be provided by the MSRB rules and how to file a complaint with an appropriate regulatory authority is available at www.MSRB.org

5. FINRA BROKERCHECK

FINRA BrokerCheck is available online at www.finra.org or by phone through the FINRA BrokerCheck hotline number, (800) 289-9999. An investor brochure is available online including information describing FINRA BrokerCheck here: http://www.finra.org/file/brokercheck-brochure.

6. FOR MORE INFORMATION

If you have any questions or concerns about the privacy of customer information, you may contact your SCF Registered Representative
7. PROTOCOL FOR BROKER RECRUITING

Privacy Choices Notice

SCF limits the personal information that your financial advisor could disclose or take if he or she moved to another brokerage or investment advisory firm and terminated the relationship with SCF Securities.

Please be aware that SCF Securities entered into the Protocol for Broker Recruiting (Protocol) on September 4, 2008, with certain other brokerage firms, and if SCF Securities remains a signatory to the Protocol as of the effective date of your advisor's termination from SCF Securities, then SCF Securities will permit your financial advisor to take your name, address, phone number, email address and the account title of the accounts serviced (or additional information as permitted if the Protocol is amended) while your financial advisor was associated with SCF Securities if your advisor joins one of these Protocol brokerage firms.

Opt-Out:

If you would like to opt out and not allow your advisor to take this information, please call 800.955.2517 or send an email to service@scfinc.com. Please note that for accounts held jointly by two or more persons, the privacy choices made by any account holder apply to all joint holders with respect to the account.