

NOTICE REGARDING CLIENT PRIVACY

Maintaining the trust and confidence of our clients is a high priority. That is why we want you to understand how we protect your privacy when we collect and use information about you, and the steps that we take to safeguard that information. This notice is provided to you on behalf of Addison Capital, Inc.

Information We Collect:

In connection with providing investment products, financial advice, or other services, we obtain non-public personal information about you, including.

- Information we receive from you on applications, other forms, or orally; and
- Information about your transactions with us, our affiliates and third parties not affiliated with us that are used by us to provide our advisory services to you.

Information We Disclose:

We will not disclose any non-public information regarding you or your account with us, except under the following circumstances:

- To our Portfolio Managers and support staff;
- To establish or maintain an account with an unaffiliated third party, such as a portfolio management software provider or a custodial broker/dealer providing services to you and/or Addison Capital, Inc.;
- To government entities or third parties in response to subpoenas or other legal process, or as otherwise permitted by law, or to ensure compliance with regulatory inquiries; or
- To third parties with your consent or at your direction.

Our Security Policy:

We restrict access to non-public personal information about you to those employees and service providers (like brokers and custodians) who need to know that information in order to carry out the advisory services that you have asked us to provide you. Only those individuals who need it to perform their jobs are authorized to have access to confidential client information. We maintain physical, electronic and procedural security measures that comply with applicable state and federal regulations to safeguard confidential client information.

Closed or Inactive Accounts:

If you decide to close your account(s) or become an inactive customer, we will adhere to the privacy policy and practices as described in this notice.

Complaint Notification:

Please direct Complaints to: Addison Capital, Inc. Attn: Compliance Department, 20 Ash Street, Suite 330, Conshohocken, Pennsylvania 19428.

Changes to This Privacy Policy:

If we make any substantial changes in the way we use or disseminate confidential information, we will notify you.

If you have any questions concerning this Privacy Policy, please write to: Addison Capital, Inc., Attn: Compliance Department, 20 Ash Street, Suite 330, Conshohocken, Pennsylvania 19428