

PRIVACY NOTICE

We Value Our Relationship

At 79 Financial we value our relationship with you and consider your privacy to be of paramount importance in maintaining that relationship. We are committed to protecting the security and confidentiality of the nonpublic personal information provided to us by our clients. As part of this commitment, 79 Financial has adopted the following privacy policy concerning the collection, maintenance, disclosure, and disposal of our clients' nonpublic personal information.

Collection of Information

As 79 Financial works with you to achieve your investment goals and to effect transactions that you request or authorize, we may collect the following types of information, some of which may be nonpublic and personal in nature: name, address, e-mail, social security number, age, financial status, assets, income, employment status, tax information, retirement and estate plan information, transaction history, account balances, risk tolerance, investment objectives, marital status, family relationships, and banking arrangements.

This information may be collected by 79 Financial via telephone and/or in-person meetings, e-mail, new account documentation and other forms of communication we use to remain current with you. We may also collect information from or about other financial institutions wherein you have relationships and/or have authorized to provide information to us. We collect and maintain this personal information in order to properly serve your investment needs. We consider protecting it a vital part of our job.

Protection and Disposal of Information

79 Financial maintains strict policies for protecting your nonpublic personal and financial information and implements physical, electronic, and procedural safeguards to protect such information. 79 Financial will dispose of records containing a client's personal identifying information utilizing one of the following methods: shredding, destruction of the personal identifying information contained in such records, modification of the records to make the personal identifying information unreadable, or other action consistent with commonly accepted industry practices to safeguard personal information.

Disclosure of Information

We do not disclose any nonpublic personal and financial information about our clients or former clients to anyone except as permitted by law, or as outlined herein. In order to provide investment services and to effect transactions that you request or authorize, we may disclose information about you to the following types of third parties:

If you have asked us to work with another investment adviser, securities broker, or financial institution, we may disclose your nonpublic personal and financial information to any of them, as well as to their service providers or legal representatives. We may disclose your nonpublic personal and financial information to any person acting in a fiduciary or representative capacity on your behalf (such as a trustee of a grantor trust or IRA custodian).

We may use custodians, mailing houses and other third-party businesses to manage your account and provide services to you and may disclose your personal and financial information to these businesses in order to better serve you.

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We may disclose your nonpublic personal and financial information to other non-affiliated third parties as permitted or required by law. For example, we may disclose to law enforcement agencies or computer security consultants for the purpose of protecting against fraud and unauthorized transactions or in order to maintain the confidentiality of our records. We may disclose your nonpublic personal information to our attorneys and accountants.

We may be required to provide information about you and your transactions to governmental agencies, self-regulatory organizations, industry associations and similar bodies in order to fulfill legal and regulatory requirements. In addition, federal and state laws give parties involved in lawsuits and other legal proceedings the right under certain circumstances to obtain information from us, including your personal and financial information. We will comply with these laws to the extent that we are required to do so.

On all occasions when it is necessary for 79 Financial to share your personal information with non-affiliated companies or third parties, we will require that such information only be used for the limited purpose for which it is shared and will advise these companies and/or third parties not to further share such information except to fulfill that limited purpose. We will not sell your personal and financial information to any outside third party. In particular, we do not sell or otherwise disclose our client lists to outside businesses that may try to sell you products and/or services.

Inactive or Former Clients

If a client decides to close their 79 Financial account(s) or becomes an inactive client, we will continue to adhere to our privacy policy and related practices with respect to that client as described in this notice.

Modification of Privacy Policy

We will notify you of our privacy policy annually as required by governing federal and/or state law. We reserve the right to modify this policy at any time, however, and will promptly notify you of any material amendment.

Policy Inquiries

Please direct your questions about this Privacy Notice to Mr. Jenkins at (412) 585-0797 or info@79financial.com.