



Customer Privacy Policy Notice

In November of 1999, Congress enacted the Gramm-Leach-Bliley Act (GLBA). The GLBA requires certain financial institutions, such as investment advisor firms, to protect the privacy of client information. In situations where a financial institution does disclose client information to nonaffiliated third parties, other than permitted or required by law, clients must be given the opportunity to opt out or prevent such disclosure. Modern Capital Concepts does not share or disclose client information to nonaffiliated third parties except as permitted or required by law.

Modern Capital Concepts is committed to safeguarding the confidential information of its clients. Modern Capital Concepts holds all personal information provided by clients in the strictest confidence and it is the objective of Modern Capital Concepts to protect the privacy of all clients. Except as permitted or required by law, Modern Capital Concepts does not share confidential information about clients with nonaffiliated parties. In the event that there were to be a change in this policy, Modern Capital Concepts will provide clients with written notice and clients will be provided an opportunity to direct Modern Capital Concepts as to whether such disclosure is permissible.

To conduct regular business, Modern Capital Concepts may collect personal information from sources such as:

- Information reported by the client on applications or other forms the client provides to Modern Capital Concepts
- Information about the client's transactions implemented by Modern Capital Concepts or others
- Information developed as part of financial plans, analyses or investment advisory services

To administer, manage, service, and provide related services for client accounts, it is necessary for Modern Capital Concepts to provide access to client information within the firm and to nonaffiliated companies with whom Modern Capital Concepts has entered into agreements with. To provide the utmost service, Modern Capital Concepts may disclose the information below regarding clients and former clients as necessary, to companies to perform certain services on Modern Capital Concepts' behalf.

- Information Modern Capital Concepts receives from the client on applications (name, social security number, address, assets, etc.)
- Information about the client's transactions with Modern Capital Concepts or others (account information, payment history, parties to transactions, etc.)
- Information concerning investment advisory account transactions
- Information about a client's financial products and services transaction with Modern Capital Concepts

Since Modern Capital Concepts shares nonpublic information solely to service client accounts, Modern Capital Concepts does not disclose any nonpublic personal information about Modern Capital Concepts'

clients or former clients to anyone, except as permitted by law. However, Modern Capital Concepts may also provide client information outside of the firm as required by law, such as to government entities, consumer reporting agencies or other third parties in response to subpoenas. In the event that Modern Capital Concepts has a change to its client privacy policy that would allow it to disclose non-public information not covered under applicable law, Modern Capital Concepts will allow its clients the opportunity to opt out of such disclosure.