

Notice of Titleist Asset Management, Ltd. Privacy Policy

Titleist Asset Management, Ltd. (TAM) is committed to keeping the personal information collected from our potential, current and former customers confidential and secure. The proper handling of personal information is one of our highest priorities. We want to be sure that you know why we need to collect personal information from you. We also want to explain to you our commitment to protect the information you provide to us. TAM will never sell your information to any outside parties.

Customer Information

TAM collects and only retains information that is necessary for us to provide services requested by you and to administer your business with us. We may collect nonpublic personal information:

- From you when you complete an application, subscription documents or other forms. This includes information such as name, address, social security number, assets, income, net worth and other information deemed necessary to evaluate your financial needs.
- As a result of transactions with us, our affiliates or others. This could include transactions completed with us, information received from outside vendors to complete transactions or to effect financial goals.

We verify our customers' identity to actively prevent, deter, and detect illegal financial activity. As of October 2003, pursuant to the USA PATRIOT Act, all customers who open new accounts will be required to provide identification verification documents to help establish their identity. At a minimum, we will verify to the extent reasonable and practicable, the identity of any customer seeking to open an account, maintain records of information used to verify a customer's identity, and check to ensure that a customer does not appear on any published government terrorist lists.

Important Information About Procedures for Opening a New Account

To help the government fight the funding of terrorism and money laundering activities, Federal law requires all financial institutions to obtain, verify, and record information that identifies each person who opens an account.

What this means for you: When you open an account, we will ask for your name, address, date of birth, social security number, and other information that will allow us to identify you. We may also ask to see your driver's license or other identifying documents.

Sharing Information

We only share your nonpublic information with non-affiliated companies or individuals as permitted by law, such as your representative within our firm, securities clearing firm, issuer, mutual funds, insurance companies and other product vendors, or to comply with legal or regulatory requirements. In the normal course of our business, we may disclose information we collect about you to companies or individuals that contract with us to perform servicing functions such as:

- Record keeping
- Computer related services
- Good faith disclosure to regulators who have regulatory authority over the company
- Companies we hire to provide support services are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. TAM limits their use of your personal information to the performance of the specific service we have requested.

We do not provide your personally identifiable information to mailing list vendors or solicitors for any purpose.

When TAM provides personal information to a service provider, we require these providers to agree to safeguard your information, to use the information only for the intended purpose, and to abide by applicable law.

Opt Out Provisions

TAM will not sell your personal information to anyone.

The law allows you to “opt out” of only certain kinds of information sharing with third parties. The Firm does not share personal information about you with any third parties that triggers this opt-out right. This means **YOU ARE ALREADY OPTED OUT.**

Employee Access to Information

Only employees with a valid business reason have access to your personal information. These employees are educated on the importance of maintaining the confidentiality and security of this information. They are required to abide by our information handling practices.

Protection of Information

TAM maintains security standards to protect your information, whether written, spoken, or electronic. We update and test our systems to ensure the protection and integrity of information.

Maintaining Accurate Information

Our goal is to maintain accurate, up-to-date customer records in accordance with industry standards. We have procedures in place to keep information current and complete, including timely correction of inaccurate information.

Disclosure of our Privacy Policy

TAM recognizes and respects the privacy concerns of our potential, current and former customers. We are committed to safeguarding this information. As a member of the financial services industry, we are sending out this Notice of Privacy Policy for informational purposes and will update and distribute it as required by law. It is also available upon request.