

**Privacy Policy**

The acquisition by investment counsel of private customer information (e.g., financial data, tax identification numbers, dates of birth, account numbers, legal documents, etc.) is required both for the provision of sound, prudent investment advice, and by law. Schultz Collins Lawson Chambers, Inc. (SCLC), collects such information on our own forms and questionnaires, and on forms completed to establish accounts and to facilitate customer transactions with other financial firms with which our customers have decided to do business. SCLC shares such information both with such unaffiliated financial firms, and with unaffiliated contractors the firm has engaged to support delivery to customers of reports, analyses, and other information about their assets under our supervision.

It is the policy of Schultz Collins Lawson Chambers, Inc.,\* that all information obtained from customers in the course of business is and shall remain confidential, and, except at customer request, shall be shared only among SCLC personnel and contractors, with financial institutions (e.g., broker/dealers, banks, insurers, etc.) to which customers have directed their business, and with such regulatory, enforcement or judicial agencies as exercise jurisdiction over the activities of the firm. Only such customer information shall be shared with other financial firms as is necessary to effect in client accounts the transactions they have approved, and to comply with pertinent rules and regulations governing SCLC and the financial firms in question. No customer information shall be shared with any unaffiliated third parties for marketing purposes.

SCLC has implemented policies and installed physical protections (e.g., firewalls, file encryption, and the like) to safeguard both the electronic and physical confidentiality of private customer information. SCLC cannot assume responsibility for the confidentiality of customer information shared by other financial firms to which customers have directed their business. In the normal course of business on the customer's behalf, such firms may share customer information with each other. Broker/dealers may, for example, share customer information with mutual fund companies in which customer accounts of the broker/dealer hold positions. Such firms may also share customer information with other affiliated or unaffiliated firms. Any sharing of customer information by other financial firms is governed by the Privacy Policies promulgated by such firms.

SCLC must comply with the rules and regulations of the SEC, FINRA, state securities regulators, and other regulatory agencies. In the course of their regular periodic examinations of firm activities, such agencies have the legal right to information about customer accounts, trading activity, etc., on demand, without limit, and without a search warrant. Only such customer information shall be provided to such regulators as is necessary to satisfy their demands.

**Customer Election to Opt In or Out of the SCLC Privacy Policy**

Under the California Financial Information Privacy Act, investment advisers with California customers cannot share non-public personal customer information with any non-affiliated third party – such as a broker/dealer to whom such customers have directed their brokerage business – without the customer's express written authorization.

**Please therefore tell us whether you elect to opt in or out of the SCLC Privacy Policy by circling your choice and signing in the box below, and returning this Election to SCLC in the postage-paid envelope provided.** You should consider retaining a photocopy of the signed Election for your records.

**PLEASE NOTE: Failure to opt in to the Privacy Policy will have the effect of preventing SCLC from administering your accounts and executing trades.** Note also that no customer election can relieve SCLC of the duty to comply with regulatory agencies having jurisdiction, by divulging to them such customer information as they may require.

<b>I hereby opt in / out (please circle your choice) of the Schultz Collins Lawson Chambers, Inc., Privacy Policy.</b>	
_____ Name	_____ Date
_____ Name	_____ Date

\* And, by extension, also of Financial Telesis, Inc.