

The Burney Company

PRIVACY NOTICE

In compliance with the Securities and Exchange Commission requirement that we inform you annually about our privacy policy, please be advised of the following:

The only information that we collect and maintain regarding you and your finances is that which you provide to your Portfolio Manager (PM), financial records maintained by your PM and reports regarding your account sent to your PM by the brokerage that has custody of your holdings. This information is closely held by your PM. The only information about you personally that is maintained at company level is your name, address and brokerage. Your PM combines data regarding your portfolio with those of his other clients to prepare statistical reports to the company, but no reports regarding individual accounts are prepared. The company needs the combined statistics to monitor performance, manage operations and prepare required reports to government agencies.

The Burney Company is not affiliated with any third party brokerages, providers of investment services, and government agencies. We provide no information about you or your account to any third party.

We are keenly aware of the need to protect your privacy. Policies recognizing this need and ensuring your privacy are included in the written agreement that the company has with all of its PMs.