

Schuchard

CAPITAL MANAGEMENT, INC.

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PRIVACY NOTICE

Under the Gramm-Leach-Bliley Act, the Securities and Exchange Commission now requires us to provide you with this notice annually.

Nonpublic Personal Information Collected

Schuchard Capital Management, Inc. collects and retains nonpublic personal information about you from the following sources:

- applications and forms you complete as required by the custodian of your assets
- legal documents you provide as required by the custodian of your assets or for use in providing financial advisory services
- account statements, trade confirmations, transaction information, and tax-related information provided by the custodian of your assets
- portfolio valuations, tax summaries, fee calculations and other reports generated by Schuchard Capital Management, Inc. in providing advisory services
- data you provide us to assist in cash flow projections, financial plan forecasts, estate planning, or in providing other financial advisory services to you

Disclosure of Nonpublic Personal Information

Schuchard Capital Management, Inc. does not disclose any nonpublic information about you to anyone, except as permitted by law. We only disclose information necessary to service you as you have authorized us in our role as financial advisor. Upon your consent or instruction, we will share only necessary information with the custodian of your assets, and your attorney, tax preparer, or pension administrator in order to carry out our advisory services.

We have no affiliates and do not disclose information to nonaffiliated third parties for marketing purposes.

The same privacy standards described in this notice are adhered to when an advisory relationship is terminated (i.e., same applies to former clients).

Security Policies

Maintaining the security, confidentiality, and integrity of your nonpublic personal information is very important to us. Your nonpublic information is accessible only to authorized employees requiring the information to provide advisory services to you. We have established rules of conduct for employees as well as standards, including administrative, technical, and physical safeguards. All employees are required to adhere to these rules and standards. Employees who fail to do so are subject to disciplinary action.