

**PRIVACY STATEMENT**

Schenley Capital, Inc. is dedicated to maintaining your privacy and providing you with the highest level of service. Keeping your personal information in the strictest confidence is a top priority.

The categories of nonpublic personal information that we collect from you may include information about your personal finances, information about your health to the extent that it is needed for the financial planning process, information about transactions between you and third parties, and information from your tax returns. We use this information to help you meet your personal financial goals.

We do not disclose any confidential personal information about our clients or former clients, except as permitted by law. If we were to anticipate such a change in our policy, we would be prohibited under the law from doing so without advising you first. With your permission, we may disclose limited information to attorneys, accountants, mortgage lenders and insurance agents with whom you have established a relationship. If you prefer that we not disclose confidential personal information about you to non-affiliated third parties, you may opt out of those disclosures; that is, you may direct us not to make those disclosures (other than disclosures permitted by law). If you wish to opt out of disclosures to non-affiliated third parties, you may notify us at any time by telephone, mail, fax, email, or in person. With your permission, we share a limited amount of information about you with your brokerage firm in order to execute securities transactions on your behalf.

We will internally safeguard your nonpublic personal information by restricting access to only those employees who provide services to you or those who need access to your information to service your accounts. In addition, we will maintain physical, electronic, and procedural safeguards that meet federal and/or state standards to guard your nonpublic personal information.

Personally identifiable information about you will be maintained while you are a client, and for the period thereafter that records are required to be maintained by federal and state securities laws. After that time, information may be destroyed.

We will notify you in advance if our privacy policy is expected to change.

We are required by law to deliver this Privacy Statement to you annually, in writing.