

Notice of Privacy Practices

SC views protecting private information about its Clients as a top priority. Pursuant to the requirements of the Gramm-Leach-Bliley Act (the “GLBA”) and the guidelines established by the Securities Exchange Commission regarding the Privacy of Consumer Financial Information (Regulation S-P), SC has instituted policies and procedures to ensure that such nonpublic private information is kept private and secure. This Notice describes the information SC may gather and the circumstances under which SC may share it.

As part of its business practices, SC obtains certain “nonpublic personal financial information” about its Clients, which for ease of reading will be referred to as “Information” in this notice. This Information includes data SC receives from you on applications or other forms (i.e., your name, address, social security or tax identification number, assets, income, account balances, investment activity and accounts at other institutions), information about your transactions with SC, its affiliates or others, and information SC may receive from third-party sources.

SC restricts access to the Information to authorized parties who need to know this information to provide services and products to its Clients. SC maintains physical, electronic and procedural safeguards to protect Client information.

SC does not disclose and does not wish to reserve the right to disclose, Information to affiliates or nonaffiliated third parties except under the limited exceptions for processing and servicing transactions and legal requirements. Except in those limited situations, without Client consent, SC will not make any disclosures of Information to other companies who may want to sell their products or services to you. For example, SC does not sell customer lists, and will not sell your name to a catalog company or telemarketer. SC also does not disclose and does not wish to reserve the right to disclose, Information about former Clients to affiliates or nonaffiliated third parties except under the limited exceptions for processing and servicing transactions and legal requirements.

SC only makes disclosures of Information of its Clients to nonaffiliated third parties as permitted or required by law or consented to by its Clients.