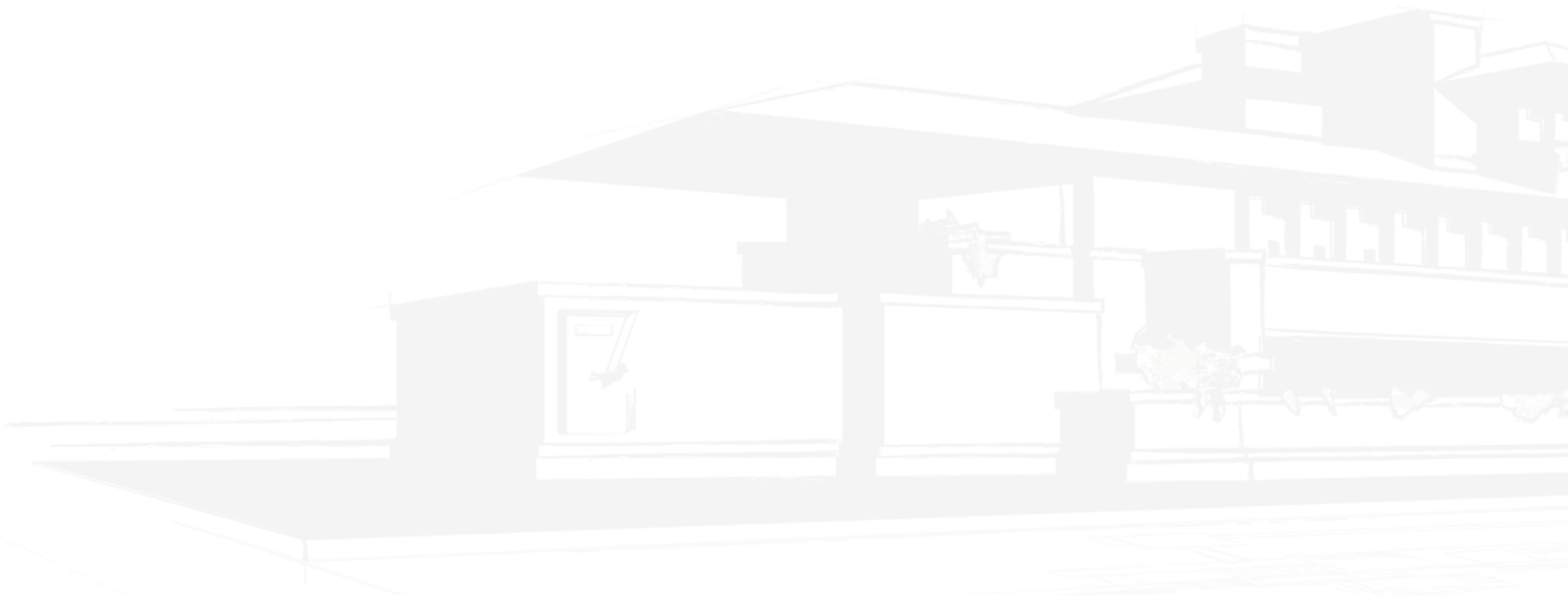




PRIVACY NOTICE



PRIVACY NOTICE TO CUSTOMERS

This Notice is provided to clients of Broyhill Asset Management, LLC (“Broyhill”) in accordance with the Securities and Exchange Commission’s rule regarding the privacy of consumer financial information (“Regulation S-P”). Please take the time to read and understand the privacy policies and procedures that we have implemented to safeguard your nonpublic personal information.

INFORMATION WE COLLECT

Broyhill must collect certain nonpublic personal information regarding its customers to ensure that it offers the highest quality financial services and products. The personal identifiable financial information which we gather during the normal course of doing business with you may include:

- Information we receive from customers on applications or other forms;
- Information about your transactions with us, our affiliates, or others; and
- Information collected through an Internet “cookie” (an information collecting device from a web server);

INFORMATION WE DISCLOSE

We do not disclose any nonpublic personal information about our customers or former customers to anyone, except as permitted by law. In accordance with Section 248.13 of Regulation S-P, we may disclose all the information we collect, as described above, to certain nonaffiliated third parties such as attorneys, accountants, auditors and persons or entities that are assessing our compliance with industry standards. We do not share any information with affiliated or non-affiliated parties for any purposes.

CONFIDENTIALITY & SECURITY

We restrict access to nonpublic personal information about you to those employees who need to know that information in order to provide financial services or products to you. We maintain physical, electronic, and procedural safeguards that comply with federal standards to guard customers’ nonpublic personal information.