

WESTOVER CAPITAL ADVISORS, LLC

ASSET MANAGEMENT & INVESTMENT COUNSEL

H. MURRAY SAWYER, JR., ESQ.

H. M. SAWYER, III, CFA

Direct Dial
(302) 427-6988

1220 N. MARKET STREET
SUITE 800

Direct Dial
(302) 427-8080

HMS@WestoverCapital.com

WILMINGTON, DELAWARE 19801-2555

Chip@WestoverCapital.com

(302) 427-9600 Voice
(302) 427-8900 Fax
www.WestoverCapital.com

PRIVACY NOTICE

Protecting Your Privacy and Security

At Westover Capital Advisors, LLC ("WCA"), your privacy is our priority.

We collect personal information to open your account(s), to process your transactions and to help us provide a better level of service. We do not sell our personal information to anyone. We protect the security and confidentiality of the personal information we collect.

Our relationship with you is our most important asset. We understand that you have entrusted us with your private financial information and we do everything we can to maintain that trust. The following are details of our approach to privacy.

Privacy Policy

WCA's privacy policy applies to consumers who are current or former clients. Throughout the policy, we refer to information that personally identifies you or your accounts as "personal information".

We do not sell your personal information to anyone.

We do not disclose personal information to third parties, unless one of the following limited exceptions applies.

- We disclose personal information, such as account and transaction data, to companies including financial institutions that contract with WCA to manage portfolios, execute transactions or act in a custodial capacity, etc.

- We may disclose personal information to companies that help us process or service your transactions or account(s), including companies that print and mail your account statements.
- We may disclose or report personal information in limited circumstances namely when a good faith disclosure is required by law. (For example: to cooperate with regulators or law enforcement authorities, resolve consumer disputes or for institutional risk control.)

Outside of these expectations we will not share your personal information with third parties unless you have specifically authorized us to do so.

We do collect personal information in the normal course of business in order to administer your accounts and serve you better.

- **Application and registration information.** We collect information that you provide to us when you establish an investment advisory relationship with us (an "account"). The information we collect may include name, address, phone number, e-mail address, Social Security Number, financial information and information about your investment objectives and experience.
- **Transaction information.** Once you have an account with us to administer your account and better service you we collect and maintain personal information about your transactions, including balances, positions and history and may include your name or other data in an internal client list reflective of your activities at WCA and with outside custodial providers.

We use your personal information to fulfill our regulatory obligations and to help us deliver the best possible service to you.

- WCA is required by its various regulatory authorities, such as the U.S. Securities and Exchange Commission (the "SEC") and state jurisdictions to collect, review, and maintain certain personal information such as investment history, financial data, etc. in order to fulfill various regulatory requirements.

We protect the confidentiality and security of your personal information.

- Companies we engage to provide support services (such as accounting services) are not allowed to use your personal information for their own purposes and are obligated to maintain strict confidentiality. We limit their use of your personal information to the performance of the specific service we have requested.
- We restrict access to personal information to select associates who have a need for such information for business purposes only. All our associates are trained and required to safeguard such information.
- We maintain physical, electronic and procedural safeguards to guard your personal information.

We continue to evaluate our efforts to protect personal information and make every effort to keep your personal information accurate and up-to-date.

- If you identify any inaccuracy in your personal information or you need to make a change to that information please contact us so that we may promptly update our records to better serve you.

We will provide notice of changes in our information-sharing practices.

- If, at any time in the future, it is necessary to disclose any of your personal information in a way that is inconsistent with this policy we will give you advance notice of the proposed change so that you will have the opportunity to opt out of such disclosure.

February 12, 2010