BELLMARK
PARTNERS
INVESTMENT BANKING

617.574.9900
216.575.1001 *fax*

Privacy Policy and Complaint Notification

BellMark Partners, LLC's (" BellMark") relationship with you is based on trust and protecting the privacy of your personal information is a high priority for us. "Non-Public Information" is information received by BellMark that identifies you, your business entity, and any personal or business assets. The following policies apply to consumers who are present or former clients of BellMark.

1. BellMark collects personal and business information to provide a high level of service. BellMark does not sell your information to anyone, under any circumstances.

2. Unless you have specifically authorized BellMark to do so, BellMark does not disclose your non-public

information to others except in two limited circumstances.

- BellMark discloses non-public information to co-advisers, brokers and other agents that help us process your transactions, such as vendors providing administrative services, marketing services, data processing or computer software maintenance and development. These co-advisers, brokers, and vendors or other agents, are required to sign a non-disclosure agreement agreeing to maintain the confidentiality of non-public information. These entities are required to have policies and procedures in place to protect your confidential information.

- BellMark may also disclose non-public information if BellMark believes in good faith that such disclosure is required to comply with applicable laws, such as cooperating with regulators, or to comply with court orders. For example, to help the government, fight the funding of terrorism and money laundering activities, Federal Law requires all financial institutions to obtain, verify, and record information that identifies each person who opens an account. So, when you begin a relationship with us, BellMark will ask for name, address, date of birth, date of incorporation and/or other information that will allow us to identify you and/or your business. BellMark may also ask to see your passport, driver's license, or other identifying documents.

3. BellMark collects information from you using due diligence lists, verbal requests, or other means determined by you or BellMark. The information we collect may include name, address, telephone and facsimile numbers, email addresses, and Social Security number or tax identification number, among other documents.

4. BellMark internally safeguards your non-public information by restricting access to only those individuals associated with BellMark that provide products or services to you or to those who need access to your information to service your transactions. In addition, BellMark maintains physical, electronic, and procedural safeguards that meet applicable legal standards to protect your non-public information. BellMark does not share information with any affiliated entities unless necessary to do so to service your transaction.

5. If at anytime in the future it is necessary for BellMark to disclose any of your information in a manner inconsistent with this privacy policy statement, BellMark will give you advance notice of the proposed change so that you will have any opportunity to "opt out" of such disclosure.

For more information-If you have questions about BellMark's Privacy Policy please direct written correspondence to the address listed above.

In the event you have a complaint, please direct written correspondence to the Compliance Department, at the address listed above.