

CUSTOMER IDENTIFICATION PROGRAM

Important information you need to know about opening a new account. To help the government fight the funding of terrorism and money laundering activities, federal law requires financial institutions to obtain, verify and record information that identifies each person who opens an account. This Notice answers some questions about our Customer Identification Program.

What types of information will I need to provide?

When you open an account, we are required to collect information such as the following from you:

- Your name
- Date of Birth
- Address
- Identification Number:
 - US citizen: Taxpayer ID number (social security number or employer identification number)
 - Non-US citizen: Taxpayer ID number, passport number, and country of issuance, alien identification card number, or government -issued identification showing nationality, residence, and a photograph of you.
- Copy of Driver's License
- Occupation and Place of Employment

A corporation, partnership, trust or other legal entity may need to provide other information, such as the principal place of business, local office, employer identification number, certified articles of incorporation, government-issued business license, a partnership agreement, or a trust agreement.

US Department of the Treasury, Securities and Exchange Commission, FINRA, and the NYSE rules already require you to provide most of this information. These rules also require you to provide such additional information, such as your net worth, annual income, investment experience and objectives, and risk tolerance.

What happens if I don't provide the information requested or my identity cannot be verified?

We will not be able to open an account or carry out transactions for you. If we have already opened an account we will have to close it.

PRIVACY POLICY

As part of the Financial Services Modernization Act, financial institutions like Nelson Securities, Inc. (Nelson) are required to provide a written privacy policy to certain Nelson account owners annually. Nelson Securities, Inc. recognizes that customers have an expectation that Nelson and its affiliates will maintain the confidentiality of customer's nonpublic personal information. As a result, Nelson has adopted this Privacy Policy concerning information that you provide and information that is obtained in servicing your account.

Information about you is collected for purposes of administering your account or accounts with us.

We collect information about you for specific business purposes and not for resale or transfer to unaffiliated parties. The information we collect, the source of the information and the purposes it is used for are explained below. If you close your account or it becomes inactive, Nelson will adhere to the privacy policies and practices described in this notice.

Information Collected

Nonpublic personal information is collected and retained by Nelson for purposes of administering your account. It is not furnished to third parties for any purpose other than to administer the account. The information we collect can be summarized as follows:

- 1. Account Establishment Information.** This is information furnished by you on forms creating your account with Nelson. Examples are your name and address, social security number and beneficiary designations (if applicable).
- 2. Account Transaction Information.** This includes information obtained from you and the various entities that comprise the assets in your account. It includes correspondence and phone contacts with us concerning the account, account assets, and our services. If the account was transferred from another financial institution, it may contain records from that institution.

Nonpublic Information that is Disclosed

All information in your account may be disclosed to any person or entity you have authorized pursuant to your account establishment documents. In addition, information may be disclosed to affiliated or nonaffiliated third parties to further your goals in establishing an account with Nelson. Categories of information that are disclosed are as follows:

- 1. Identifying Information.** Examples of this information include your name, address and social security or tax identification number.
- 2. Transaction Information.** Examples include your directives to purchase or sell an asset in your account and the receipt of income to the account or distributions from the account.

Parties to whom we may Disclose Non-public Information

Nelson may disclose both identification and transaction information to affiliated and nonaffiliated parties for the following reasons:

- 1. Financial Services Providers.** Examples are brokers, transfer agents, mutual fund companies or other representatives of the seller or purchaser of the asset or a firm that provides valuations for securities.
- 2. Non-financial Companies.** Examples are companies that mail reports and prospectuses to you, statement printers and tax form providers.

Nelson does not disclose nonpublic personal information about our clients to any party, except as permitted by law.

How Nelson Protects the Confidentiality of Your Nonpublic Personal Information

Nelson values the trust you place in us. To maintain that trust, we have put into place safeguards to protect the privacy of your nonpublic personal information. We do not sell or trade your information with nonaffiliated companies. When information is provided to third party providers to service the account, safeguards are in place to make certain that the information is used only for the purpose it is provided.

Internally, Nelson maintains its records on secured computers. New employees are advised of Nelson privacy policies and of the confidential nature of the information they handle. Employees are limited to accessing only that customer information that is necessary to perform their job functions.