

SPARROW CAPITAL MANAGEMENT, INC.
Investment Research and Portfolio Management

CLIENT PRIVACY POLICY

The following is a description of Sparrow Capital Management, Inc. (SPARROW) policies regarding disclosure of nonpublic personal information that you provide to SPARROW or information that we may receive from third parties with respect to your account.

Categories of Information SPARROW Collects. SPARROW collects the following nonpublic personal information about you:

- Information SPARROW receives from you on or in applications or other forms, correspondence or conversation (such as your name, address, phone number, assets, income and date of birth)

- Information about your transaction with SPARROW, its affiliates or others (such as your account number and balance, payment history, parties to transaction, cost basis information, and other financial information)

Categories of Information SCM Discloses. SPARROW does not disclose any nonpublic personal information about its current or former account holders to unaffiliated third parties, except as required or permitted by law. SPARROW is permitted by law to disclose all of the information it collects, as described above, to its service providers (such as an account's custodian) to process your transactions and otherwise provide services to you.

Confidentiality and Security. SPARROW restricts access to your nonpublic personal information to those persons who require such information to provide products or services to you. SPARROW maintains physical, electronic and procedural safeguards that comply with federal standards to guard your nonpublic personal information.