

## Nancy Barron & Associates Incorporated

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### PRIVACY POLICY

Effective January 2, 2002 in order to comply with the Privacy Provisions of the Gramm-Leach-Bailey Act, Nancy Barron & Associates, Inc. [hereinafter, “NBA”] has implemented the following NBA Privacy Policy to codify the protection of certain non-public information about their clients. This policy is intended to work in tandem with the privacy policy issued by NFSL.

#### *The NBA Commitment*

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NBA is pledged to safeguard the use of client’s personal information that is collected in the course of doing business with those clients.

NBA does not sell any non-public information to anyone. Nor does NBA provide such information to any others except as may be necessary for discrete and proper business purposes or as mandated by authorized regulatory bodies.

#### *NBA Information Collection*

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NBA may collect information from their clients from numerous sources, including but not limited to the following:

- Information clients may provide in establishing a new account with NBA including but not limited to their name, address, telephone number and social security numbers.
- Information clients may provide to NBA about their transactions outside NBA
- Information from consumer reporting agencies, public records and other data collection agencies.

#### *NBA Information Use and Disclosure*

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NBA shall protect the security and confidentiality of all personal information and will make every effort to ensure that such information is used solely for proper business purposes in connection with the management and servicing of the client’s account(s).

In situations where client information is shared [such as with correspondent clearing firms and mutual funds], NBA requires other parties to treat and maintain the privacy of that information to at least the same extent and with the same degree of diligence and careful attention that is required by NBA.

NBA does not disclose, and has no intention to disclose, any non-public personal information to non-affiliated third parties with respect to persons who are no longer our clients.

#### *NBA Security Procedures*

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All NBA employees are advised about the NBA commitment to safeguard the confidentiality of our client’s non-public personal information. In addition, NBA maintains physical, procedural and electronic safeguards to protect this information from unauthorized access and dissemination.

#### *Client Rights*

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NBA will send all clients a notice of our privacy policy annually for as long as a client maintains an ongoing business relationship with NBA. The practices and policies contained in this disclosure are subject to change, but NBA will communicate any material changes to their clients and provide a revised notice incorporating any material changes before NBA implements such changes.