

OUR PRIVACY POLICY

Your privacy is a top priority for Multi-Financial Securities Corporation and its subsidiaries ("Multi-Financial"). We take our commitment to protecting the confidentiality of your non-public personal information seriously. Financial service providers choose how they share information, and federal law gives customers the right to limit some, but not all, sharing. Our Privacy Policy tells you how we collect, share and protect your information and provides you with an opportunity to opt out of sharing in certain circumstances as described below.

Information That We Collect

We collect personal information about you from a variety of sources to help us serve your financial needs, offer products and services and satisfy our legal and regulatory requirements.

- We receive information provided by you or on your behalf, to us, or to our registered representatives, agents or financial professionals ("financial professionals"). This information may be provided on forms and applications as well as through personal discussions. For example, this information may include: social security number, name, address, birth date, assets, income, beneficiary, employment, health and other financial information.
- We acquire information regarding your account and transaction history, including products and services, balances, account history, payment history and information as to your creditworthiness and history from our affiliates, unaffiliated service companies and consumer reporting agencies.
- We receive information from other unaffiliated third parties, including employers, associations, benefit plan sponsors, financial aggregators and other institutions, including from institutions where you have had a relationship.

Information We May Disclose

We do not sell or disclose your non-public personal information to non-affiliated third party marketing companies.

We may disclose information that we collect as required to conduct our business and as permitted or required by law, or in connection with joint marketing agreements which we may enter into with third parties (e.g., for the joint offering of a product or service). We may share information about you with our affiliates or unaffiliated financial institutions such as our clearing firm, broker-dealers, investment advisors, third party administrators, plan sponsors, mutual funds, insurance companies or agencies, solicitors and other third parties who assist us in providing account or related services to you. We share information with non-financial companies that provide services to us such as consumer reporting agencies and consulting firms.

If your account was opened in our offices located at a financial institution, such as a bank, thrift or credit union, and that financial institution decides to enter into a relationship with a new financial service provider, we will share your information with that new financial service provider so that your account can continue to be serviced.

We may share your information with auditors, regulators, non-regulatory industry licensing/registration entities and law enforcement organizations, including in response to court orders, subpoenas, or inquiries, or as permitted or required by law.

You are not able to opt out of our sharing your information for the purposes described in this section. See *State Information* below.

Other Sharing

If your financial professional is not affiliated with a financial institution and leaves Multi-Financial to join another firm, or elects to sell or transfer some or all of his or her business, your financial professional may retain copies of your personal information so

that your account can continue to be serviced or to contact you regarding your options. To do this, your financial professional may share your non-public personal information with the new financial service provider.

If you do not want your financial professional to take your information should he or she leave or transfer his or her business from Multi-Financial, you have the right to opt out of such disclosure. If you live in an "opt-in" state (such as California, Massachusetts, Maine, Alaska, North Dakota or Vermont), then we will not share your information with unaffiliated third parties who are not servicing your account without your affirmative consent. You may opt out now or at any time in the future. If you have a joint account, we will treat an opt out by any joint customer as applying to all joint customers. If you wish to exercise your right to opt out under this section, please contact us at 888-447-8608 or by mail.

Data Safeguarding

We have implemented security standards and processes as well as physical, electronic and procedural safeguards—including training and confidentiality agreements, designed to protect your information.

Policy Relating to Former Customers

If you decide to close your accounts with us, or become an inactive customer, our Privacy Policy will continue to apply to you. If you would like a copy of our current Privacy Policy, please feel free to contact us or visit our website.

Changes to Our Privacy Policy

Multi-Financial maintains a public website at www.multifinancial.com. While this policy is delivered annually in writing, the policy may change from time to time. You can always review our current policy, as well as our list of affiliates, and other disclosures online.

State Information

California residents: For accounts with a California mailing address, we will

not share your personal information with a financial company for joint marketing purposes except as required or permitted by law.

Vermont residents: For accounts with a Vermont mailing address, we will not share your creditworthiness information with our affiliates except as required or permitted by law. For joint marketing with other financial companies, we will disclose only your name, contact information, and information about your transactions, unless otherwise required or permitted by law.

List of Affiliates that this notice applies to (as of August 1, 2011):

MFSC Insurance Services, Inc.
Multi-Financial Securities Corporation

Other Important Information

Our public website contains additional information that might be of interest to you, including a brochure about investing, a statement about Multi-Financial's compensation sources and information about our Strategic Partners Program.

Multi-Financial is a member of the Securities Investor Protection Corporation (SIPC). You can obtain information about SIPC, including a brochure, by contacting SIPC at 202.371.8300 or on their website at www.sipc.org.

In addition, the Financial Industry Regulatory Authority (FINRA) makes available information about the registration status and/or disciplinary record of broker-dealers and their registered representatives. The information can be obtained by calling toll-free at 800.289.9999. The FINRA website contains other useful information for investors at www.finra.org.