

Muchler Financial Services, Inc.

Customer Information Privacy Principles

Like most industries today, the financial services industry is rapidly being shaped by technology, which is literally changing the way we do business. To be successful in this environment, we must continue to ensure that our customers are confident that we will manage their financial affairs expertly and confidentially.

At Muchler Financial Services, our customers have access to a broad range of products and services. To deliver these products and services as effectively and conveniently as possible, it is essential that we use technology to manage and maintain certain customer information.

We want to assure all of our customers that whenever information is used, it is done with discretion. The safeguarding of customer information is an issue we take seriously at Muchler Financial Services. To affirm our continuing commitment to the proper use of customer information, we have set forth the following Privacy Principles. It is these Privacy Principles that guide us in serving the privacy needs of our customers.

- 1. Recognition of a Customer's Expectation of Privacy:** At Muchler Financial Services, we believe the confidentiality and protection of customer information is one of our fundamental responsibilities. And while information is critical to providing quality service, we recognize that one of our most important assets is our customers' trust. Thus, the safekeeping of customer information is a priority for Muchler Financial Services.
- 2. Use, Collection, and Retention of Customer Information:** Muchler Financial Services limits the use, collection, and retention of customer information to what we believe is necessary or useful to conduct our business, provide quality service, and offer products, services, and other opportunities that may be of interest to our customers. Information collected may include, but is not limited to: name, address, telephone number, tax identification number, date of birth, employment status, annual income and net worth.
- 3. Maintenance of Accurate Information:** Muchler Financial Services recognizes that it must maintain accurate customer records. Therefore, we have established procedures to maintain the accuracy of customer information and to keep such information current and complete. These procedures include responding to requests to correct inaccurate information in a timely manner.
- 4. Limiting Employee Access to Information:** At Muchler Financial Services, employee access to personally identifiable customer information is limited to those with a business reason to know such information. Employees are educated on the importance of maintaining the confidentiality of customer information and on these Privacy Principles. Because of the importance of these issues, all Muchler Financial Services employees are responsible for maintaining the confidentiality of customer information and employees who violate these Privacy Principles will be subject to disciplinary measures.
- 5. Protection of Information via Established Security Procedures:** Muchler Financial Services recognizes that a fundamental element of maintaining effective customer privacy procedures is to provide reasonable protection against the unauthorized access to customer information. Therefore, we have established appropriate security standards and procedures to guard against any unauthorized access to customer information.

- 6. Restrictions on the Disclosure of Customer Information:** When it comes to sharing customer information with unaffiliated companies, Muchler Financial Services places strict limits on who receives specific information about customer accounts and other personally identifiable data. Muchler Financial Services may share information with such companies if they provide a product or service that may benefit our customers. Whenever we do this, we carefully review the company and the product or service to make sure that it provides value to our customers.

We share the minimum amount of information necessary for that company to offer its product or service. We may also share information with unaffiliated companies that assist us in providing our products and services to our customers; in the normal course of our business (for example, with consumer reporting agencies and government agencies); when legally required or permitted in connection with fraud investigations and litigation; in connection with acquisitions and sales; and at the request or with the permission of a customer.

- 7. Maintaining Customer Privacy in Business Relationships with Third Parties:** If we provide personally identifiable customer information to a third party with which we have a business relationship, we will insist that the third party keep such information confidential, consistent with the conduct of our business relationship.
- 8. Disclosure of Privacy Principles to Customers:** Muchler Financial Services recognizes and respects the privacy expectations of our customers. We want our customers to understand our commitment to privacy in our use of customer information. As a result of our commitment, we have developed these Privacy Principles which are made readily available to our customers. Customers who have questions about these Privacy Principles or have a question about the privacy of their customer information should call Terry Muchler, our Chief Compliance Officer at (585) 335-5190 or e-mail him at tmuchler@ssnrep.com.

These Privacy Principles apply to individuals, and we reserve the right to change these Privacy Principles, and any of the policies or procedures described above, at any time without prior notice. These Privacy Principles are for general guidance and do not constitute a contract or create legal rights and do not modify or amend any agreements we have with our customers.

In its capacity as investment advisor, Muchler Financial Services may disclose personal financial information regarding its clients to affiliated third parties as deemed necessary by Muchler Financial Services to fulfilling its obligations and responsibilities as the client's investment advisor. Clients wishing to opt out of such informational disclosure may do so by notifying Muchler Financial Services in writing of their opt out instructions. Muchler Financial Services will not at any time share confidential client information with unaffiliated entities not directly engaged in fulfilling our Firm's investment advisory responsibilities to our clients.

Terry Muchler
Chief Compliance Officer
Muchler Financial Services, Inc.