



PRIVACY POLICY

At Pearson Capital, Inc., protecting our clients' privacy is paramount; we recognize that an individual's financial matters are extremely private and sensitive in nature. Our commitment is to maintain strict standards to safeguard your personal financial information at all times, while diligently seeking to continue to bring you valuable products and services.

This information is being provided to you as required by Regulation S-P which was adopted last year by the Securities and Exchange Commission to modernize the laws governing the financial services industry.

Information We Collect and Share

The personal financial information we collect directly from you includes information required to communicate with you and to assist us in effectively addressing your financial needs, as well as to operate prudently in complying with the legal and regulatory requirements imposed by federal and state regulations.

Such personal financial information we may collect and share is made available to us from the following sources:

- Information received on applications and other forms, such as your name, mailing address, telephone number, e-mail address, fax number; and to identify who you are, your Social Security number.
- Information about your financial transactions with us, our affiliates, or others, such as account balance, securities trading activity, fund transfers, and checking transactions.
- Information as required by law to ascertain your experience in margin use and trading, such as your approximate annual income and net worth.
- Information we may obtain about you from a consumer reporting agency, such as your credit worthiness and credit history.

In all cases, we collect and share only personal financial information that is either required by law or necessary to provide personalized financial services to you.

Other information we may collect indirectly from you includes your IP address, browser type, and operating system used when you access our Web site. We do this through the use of cookies, which are small text files sent from the Web server to your computer. Cookies help us to know you better by providing operational data we can use to aid your interaction with our Web site and improve its navigation and usability. Standing alone, cookies, GIFs and other Web tools, as well as data derived from them, do not identify you personally - they merely recognize your browser. Unless you choose to identify yourself to us by requesting additional information through our Web site about our service, you will remain anonymous.

Our Use of Your Personal Financial Information

In the course of conducting investment advisory services on your behalf, there are occasions where we may engage affiliated and/or nonaffiliated companies to (i) service or process a financial product or service requested by you or, (ii) to maintain or service your account(s). These companies may be engaged in a related business such as mutual funds, annuities or other insurance products, consumer banking, mortgage lending, securities brokerage, investment advisory or tax, estate or financial planning. Or they may be engaged in some service such as a transfer agent, clearing or custodial firm, accounting or reporting, systems operation or marketing. In such cases, the personal financial information we may share about you with these companies is necessary and permissible by law to administer, process, service, and enforce a transaction that you requested or authorized. We may also share some or all of your personal financial information with your legal representative, trustee or other fiduciary, or where we need to protect the confidentiality and security of our records, or to prevent potential or actual fraud, unauthorized transactions, claims or other liability, for institutional risk control or resolving customer disputes or inquiries. Also, as permissible by law, we may provide your personal financial information on request, for example, to insurance rate advisory organizations; funds guaranty agencies; agencies rating our compliance with industry standards; and our attorneys, accountants and auditors. In addition, subject to the Right to Financial Privacy Act, sharing of your personal financial information is permitted on request by a law enforcement agency, regulator, self-regulatory agency or in a public safety investigation. Such sharing of your personal financial information is also permitted on request by a consumer reporting agency in accordance with the Fair Credit Reporting Act, or to comply with federal, state or local laws, rules or regulations, including requirements of self-regulatory organizations or a subpoena or judicial process. Outside of the exceptions mentioned above and as permitted by law, we will not share your personal financial information with anyone, unless you specifically ask us in writing to do so.

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Revised January 2012

Confidentiality and Security

When we share your personal financial information with affiliated and/or nonaffiliated companies, they are not allowed to use your personal financial information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of your personal financial information to the performance of the specific service we have requested. We restrict access to your personal financial information to employees who need to know such information in providing products or services to you. We maintain physical, electronic, and procedural safeguards that comply with applicable federal regulations to guard your personal financial information. Of course, even with these safeguards, we cannot guarantee that your personal financial information will always be safe from unauthorized sharing, and we assume no responsibility or liability in that event, except as and to the extent that may be imposed by law.

Miscellaneous

- We reserve the right to change this Privacy Notice at any time. In that event, we will inform you of any material changes as required by law.
- If you decide to close your account(s) or become an inactive customer, we will adhere to the privacy policies and practices described in this notice.
- Please keep this Privacy Notice for your records.
- This Privacy Notice has been established and is given in accordance with applicable federal law. It is not intended and in no event shall it be deemed to constitute an offer or agreement of any kind on our part or to impose any duty or obligation of any kind upon us except as and to the extent expressly required by law.

What you should know about your Pearson Capital, Inc. management fee. CHECK YOUR TD AMERITRADE STATEMENTS for your specific management fee.

If assets under management exceed \$25,000, our management fee is one percent annually. Smaller accounts below \$25,000 are assessed a fee of 2% annually. We do not have any additional entry or exit fees (loads) penalties, or service charges. Our fee is extracted quarterly from the account at 25% of one percent by TD Ameritrade. Immediately following any quarterly management fee extraction, it is posted within your account's history information available on line. It is also posted in your TD Ameritrade monthly statement.

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|------------------|------------------------|------------------|---------------------------|
| • First Quarter | January-February-March | • Third Quarter | July-August-September |
| • Second Quarter | April-May-June | • Fourth Quarter | October-November-December |

The fee extracted for each quarter, will be assessed by the amount of assets under management on the closing of the last day of the preceding quarter. Accounts opening during the quarter will have their fee prorated. The fee taken will be reflected on the TD Ameritrade statement. Arrangements can also be made to send a check quarterly, rather than have the management fee extracted from the account. For those with two or more accounts, all management fees can be extracted from one account. Please call for additional information to learn more about these services.

(Example: \$100,000 under management on March 31, 2nd quarter accessed at 1% fee/year:\$1,000 divided into 4 quarterly billing periods, at .25%, quarterly fee would be \$250.00.)

A trading fee of \$9.95 is charged to your account and paid to TD Ameritrade when a buy or sell occurs within your account. Pearson Capital, Inc. does not receive any part of the trading fee. Every time a trade is made within your account you'll also receive written notification by mail arriving within three business days. For those requesting on-line account access, this service will be provided to you immediately by PCI. You can view your account history or performance at any time. TD Ameritrade also provides monthly statements recapping current holdings and all account activity.

2012 - IMPORTANT UPDATES

(This information is also accessible on our web site www.pearsoncapitalinc.com)

Keeping our clients well informed with updates, changes and improvements within our company is paramount. We are including these important updates in our Investment Letter.

Form ADV Part II

If you would like to have our updated Form ADV Part II, or our Privacy Policy please notify us at any time, and we will email or send a copy to you immediately.

Proxy Voting

Advisor will not be required to take any action or render any advice with respect to the voting of securities in the Account, and Advisor is specifically precluded from doing so. The Advisor is hereby expressly precluded from voting proxies. Client understands and agrees that Client retains the right to vote all proxies, which are solicited for securities held in the Portfolio.