

Income Focus Portfolio Management, LLC

Privacy Notice

This notice is being provided to you in accordance with the Securities and Exchange Commission's rule regarding the privacy of consumer financial information ("Regulation S-P"). Please take the time to read and understand the privacy policies and procedures that we have implemented to safeguard your nonpublic personal information.

INFORMATION WE COLLECT

Income Focus Portfolio Management must collect certain personally identifiable financial information about its clients to ensure that it offers high quality and appropriate financial services and products. The information which we gather during the normal course of doing business with you may include:

1. information we receive from you on applications or other forms;
2. information about your transactions with us, our custodians, or others;
3. information we receive in conversations and written correspondence with you.

INFORMATION WE DISCLOSE

We do not disclose any nonpublic personal information about our clients or former clients to anyone, except as required by law. In accordance with Section 248.13 of Regulation S-P, we may disclose all of the information we collect, as described above, to certain nonaffiliated third parties such as attorneys, accountants, regulators and auditors, and persons or entities assessing our compliance with industry standards. We will disclose personal information only as described above, directed by you, or as required by law.

CONFIDENTIALITY AND SECURITY

We restrict access to nonpublic personal information about you to those employees and agents who need to know that information to provide financial products or services to you. We maintain physical, electronic, and procedural safeguards to guard your nonpublic personal information.

OPT-OUT PROVISION

It is not our policy to share nonpublic personal and financial information with unaffiliated third parties except under circumstances noted above. Since sharing under the circumstances noted above is necessary to service customer accounts or is mandated by law, there are no provisions made for clients to opt out.