

PRIVACY POLICY

CIG Asset Management ("CIG") provides a variety of investment advisory services to clients who have contracted for these services. As a result, we are required to communicate our policies related to the privacy of client information. We are committed to upholding the privacy of your information and we want you to know how it is protected and used to service your account.

In order to facilitate the servicing of your account, CIG may receive nonpublic personal information about you from the following sources:

- » Information we receive from you on questionnaires, applications, account opening documents or other forms;
- » Information about your transactions with us or others;
- » Information we receive from a consumer reporting agency; and
- » Information we received from other sources with your consent.

We do not disclose any nonpublic personal information about you to anyone, except as permitted by law. Such disclosure may include the following:

- » Disclosures to affiliates, including affiliated service providers (for example, insurance agencies for processing of variable insurance applications on your behalf);
- » Disclosures to your chosen broker-dealer firm (for example, to establish a brokerage account on your behalf);
- » Disclosures to government agencies, securities regulators and law enforcement officials (for example, for tax reporting, under a court order or to protect our legal rights);
- » Disclosures to other organizations, with your consent (for example, other investment advisory firms in order to open a managed account with their firm or the brokerage firm they utilize); and
- » Disclosures to other persons you authorize to obtain such information (for example, a CPA who will be preparing your tax return).

CIG restricts access to your personal and account information to those of our employees who need to know that information in order to provide products or services to you. We maintain physical, electronic, and procedural safeguards to guard your nonpublic personal information.

We will continue to adhere to the privacy policies and practices as described in this notice if you decide to close your account(s) or become an inactive client.

If you have any questions concerning our privacy policies and procedures, please feel free to contact us.

Thank you,

Jon Solitro
Owner and Chief Compliance Officer