

PRIVACY POLICY

1. Protection of Personal Information

As a registered investment adviser, NorthCoast Asset Management (NorthCoast) must comply with SEC Regulation S-P (or other applicable regulations), which requires registered advisers to adopt policies and procedures to protect the "non-public personal information" of natural person consumers and customers and to disclose to such persons policies and procedures for protecting that information. Non-public personal information includes non-public "personally identifiable financial information" plus any list, description or grouping of customers that is derived from nonpublic personally identifiable financial information.

2. What Do We Collect?

NorthCoast may collect certain personally identifiable financial information about its clients so we may provide suitable financial recommendations. Non-public personal information gathered during the normal course of doing business may include (but is not limited to):

- Social Security numbers;
- Your annual income and net worth;
- Account numbers;
- Account balances;
- Investment experience;
- Tax liability;
- Risk Tolerances;
- Investment Objectives and Goals; and
- Other personal or family obligations.

3. How Do We Protect Your Information?

We restrict access to your nonpublic personal information to those employees who need to know that information to provide financial services to you. We maintain physical, electronic, and procedural safeguards that comply with federal standards to guard your nonpublic personal information.

4. When Is the Information Shared?

REASON	DOES NORTHCOAST DISCLOSE?	CAN YOU LIMIT THIS?
For our everyday business purposes: to process your transactions, maintain your account(s), settle transactions, and respond to regulatory inquiries (including court orders and legal investigations or reports to credit bureaus).	YES	NO
For our internal marketing purposes: to offer products and services to you.	YES	NO

For our affiliates' and service providers' everyday business purposes: information necessary to provide our services to you.	YES	NO
For non-affiliates to market to you.	NO	WE DO NOT SHARE
For joint marketing with other unaffiliated financial institutions.	NO	WE DO NOT SARE

5. Information We May Disclose

As stated in the table above, we restrict the disclosure of your personal non-public and confidential information. We only disclose your information as indicated or as required by law. In accordance with Regulation S-P, we may disclose all of the information we collect, as described above, to certain non-affiliated third parties such as attorneys, accountants, auditors and persons or entities that are assessing our compliance with industry standards. We enter into contractual agreements with all non-affiliated third parties that prohibit such third parties from disclosing or using the information other than to carry out the purposes for which we disclose the information.

Federal law gives you the right to limit our disclosure of nonpublic personal information to a non-affiliated third party. State laws may give you additional rights to limit sharing. Please contact us in writing to limit the sharing of your personal information at One Greenwich Office Park, Greenwich CT 06831 or you may email your NorthCoast representative.