

July 1, 2011

Attention Portfolio Capital Management Clients,

We at Portfolio Capital Management (“PCM”) have implemented strict measures to safeguard your personal information. Due to the introduction of the Gramm-Leach-Bliley Act, we are issuing the following privacy notice regarding your nonpublic personal information. Nonpublic personal information is information that we collect in connection with providing a financial product or service to you. Nonpublic personal information does not include information that is available from public sources, such as telephone directories or government records.

Please be assured that your information is only accessed by authorized persons, and only when needed. We will not disclose nonpublic personal information about you to anyone except as disclosed in the attached policy or as permitted by law. We may disclose nonpublic personal information about you to companies that perform marketing services on our behalf in order to provide comprehensive and effective service or to provide information about additional products and services.

If you have any questions regarding this or any other services provided by us, please do not hesitate to contact our office at 704-552-0073 or 1-800-613-0098.

Portfolio Capital Management, Inc.

Portfolio Capital Management, Inc. (“PCM”) Consumer Privacy Policy

“Protecting Your Privacy - Our Pledge to You”

We believe the opportunity to help you meet your financial objectives is a great privilege and carries with it a great responsibility. Protecting your confidential information is very important to PCM. With this in mind, we pledge the following privacy principles.

- I. *Your privacy is a top priority.*
As we work together, you often entrust us with personal and financial information. We use that information to provide products and services to you, to help you achieve your financial goals, and to communicate better with you. We promise to protect the security, privacy, and use of your personal and financial information, including account and transaction details.
- II. *The products and services PCM uses are delivered in a secure environment.*
When we use the Internet to access information on your account from third party custodians, you can feel confident that we use security measures that are appropriate to protect personal and financial information. We use a 128-bit secure socket connection behind our firewall.
- III. *Keeping your personal information accurate and current is a vital concern.*
We strive to keep your personal and financial information accurate. If you believe that our records are incorrect or out of date, please notify us. We will make any necessary corrections immediately.
- IV. *Employee access to your information is limited.*
PCM employees have limited access to client information based on their job function. This enables them to assist you in your transactions, offer additional financial services, and resolve problems that might arise. All employees are instructed to use strict standards of care outlined in our Code of Conduct. Employees not adhering to these standards of conduct are subject to disciplinary action, including dismissal.
- V. *Your information is shared only in limited ways and for specific purposes.*
We may share your information with companies outside PCM to provide you with a faster, more comprehensive service and to offer you additional services or products that may be of interest. We may share your information to implement security measures and fight fraud for your continued protection. We may also supply the most current and accurate information to accountants or similar organizations if directed by the client.

If we share information with other companies, they must agree to maintain the confidentiality and security of your information and to use it for the specific purpose identified by us.

On occasion, laws and regulations may require us to provide information about you and your transactions to government or regulatory agencies. In addition, federal and state laws give people involved in lawsuits or other legal proceedings the right to obtain records and information from us. We share only the information that we are required or authorized to share.

