

Buff Capital Management Privacy Statement

Buff Capital Management, is committed to maintaining the confidentiality, integrity and security of the personal information that you entrust to us.

The categories of nonpublic information that we collect from you may include information about your personal finances, information about your health, and information about transactions between you and third parties. We use this information to help you meet your personal investing goals.

1. We do not sell your personal information to anyone.

We do not provide your personal information to mailing list vendors or solicitors.

2. We do not disclose personal information to third parties except as required by law, or as authorized by you.

With your permission, we disclose limited information to attorneys, accountants, and other professionals with whom you have established a relationship and we share a limited amount of information about you with your custodian Charles Schwab to meet your goals. Third parties have confidentiality policies of their own to protect your information.

We require strict confidentiality in our agreements with unaffiliated third parties that require access to your personal information, including financial service companies, consultants, and auditors. Federal and state securities regulators may review our Company records and your personal records as permitted by law.

3. We do collect personal information in the normal course of business in order to administer your accounts and serve you better.

Personally identifiable information about you will be maintained while you are a client, and for the required period thereafter that records are required to be maintained by federal and state securities laws. After that time, information may be destroyed.

4. We protect the confidentiality and security of your personal information.

We restrict access to personal information to our employees and agents for business purposes only. All employees are trained and required to safeguard such information.

We have taken steps to ensure the electronic privacy of clients in our processing of transactions on their behalf that we believe are effective, and we continuously review our controls in this regard. In addition, we maintain physical and procedural safeguards that comply with federal regulations to protect the privacy of your nonpublic personal information. In 2009, we instituted VOLTAGE Secure E-mail and MyFax.com to protect identifying information about you sent via electronic mail.

5. We continue to evaluate our efforts to protect personal information and make every effort to keep your personal information accurate and up-to-date.

If you identify any incorrect information, please contact us so that we may promptly update our records. Information such as address and beneficiary changes also needs to be updated by you at Charles Schwab.

6. We will provide notice of changes in our information-sharing practices.

If, at any time in the future, it is necessary to disclose any of your personal information in a way that is inconsistent with this policy, we will give you advance notice of the proposed change so that you will have the opportunity to opt out of such disclosure.

We recognize that financial and personal information has been entrusted to us with the expectation that it will remain private, and we treat this responsibility seriously.

If you have any questions or concerns, please contact us by e-mail at gayle@buffcapital.com or call us at 617-641-2377. *

* Last Updated on January 16, 2010

Buff Capital Management Privacy Policy Procedure

Buff Capital Management provides the privacy policy to clients when it establishes the client relationship and annually thereafter along with the 1st quarter mailing.