



2nd Market Capital Advisory Corporation Privacy Notice

The Securities and Exchange Commission and the Federal Trade Commission have adopted new rules that require financial institutions, like 2nd Market Capital Advisory Corporation, to provide privacy policy notices to their clients. 2nd Market Capital Advisory Corporation believes that protecting the privacy of current, former and prospective investors and their personal information is of the utmost importance and we are fully committed to maintaining the privacy of such information in our possession. In accordance with the new rules we are providing current and prospective investors with the following information.

2nd Market Capital Advisory Corporation collects non-public personal information about current and prospective investors from the following sources: information we receive from current and prospective investors on managed account agreements or subscription documents and related forms (for example, name, address, social security number, birth date, assets, income, investment experience) and information about investor's transactions with 2nd Market Capital Advisory Corporation. We restrict access of current, former and prospective investors' non-public information to our affiliates and their personnel, counsel, and auditors who need to know that information in order to (i) insure compliance with applicable laws and regulations, or (ii) provide products or services to the investors. Accordingly, 2nd Market Capital Advisory Corporation maintains physical, electronic, and procedural controls in keeping with federal standards to safeguard the non-public personal information about current, former, and prospective investors that is in our possession.

If, at any time in the future it is necessary to disclose any of a client's personal information in a way that is inconsistent with this policy, 2nd Market Capital Advisory Corporation will give advance written notice of the proposed change so that its clients will have the opportunity to "opt out" of such disclosure.

Disclosure of Privacy Principles to Customers: 2nd Market Capital Advisory Corporation recognizes and respects the privacy expectations of our clients. We want our clients to understand our commitment to privacy in our use of customer information. As a result of our commitment, we have developed these Privacy Principles which are disclosed annually to clients. Clients who have questions about these Privacy Principles or have a question about the privacy of their customer information should call Robin Sherman at (800)999-7793 or e-mail her at rsherman@2ndmarketcapital.com.