

Pinnacle Investment Advisors Privacy Policy

June 30, 2013

The Need for a Privacy Policy

Pinnacle Investment Advisors issues a copy of our privacy policy to all of our clients at the time they open an account. We have created this policy in order to comply with Securities and Exchange Commission Regulation S-P, a rule intended to safeguard the privacy of individual's financial information.

The Pinnacle Privacy Policy

At Pinnacle Investment Advisors, your personal privacy is our priority. It is our policy to never sell information about our clients to outside parties, and to limit our disclosure of information to third parties to an absolute minimum.

Information Distribution

Pinnacle Investment Advisors does not distribute personal information to third parties, unless one of the following limited exceptions applies.

- We will disclose information about you to companies that serve as the custodians of your securities, such as Charles Schwab and Fidelity Investments. It is necessary to disclose information to these custodians in order to open accounts and execute transactions.
- We may disclose information about you to our bond dealers in certain limited circumstances, where it is necessary for us to do so in order to facilitate a trade.
- We may disclose information about members of our private funds to our accountants and legal advisors so that they may discharge their duties.
- We may disclose information about you if you direct us to do so, or if we are compelled by law to do so, or in other legally limited circumstances.

Other Sources of Information

The custodian of your account may, over time, gather information about your transaction history as a result of executing transactions, and may disclose that information. Such information is governed by the custodian's privacy policy, which you should have received when you opened your account.

Safeguards on Your Information

We restrict access to your information to those Pinnacle employees who need to know the information to provide our services to you. Your information is both physically and electronically safeguarded.