

**LWI FINANCIAL INC.
LORING WARD SECURITIES INC.
PRIVACY POLICY AND ADDITIONAL DISCLOSURES**

PRIVACY POLICY

LWI Financial Inc. and Loring Ward Securities Inc. (collectively, “Loring Ward”), believe that the trust of our Advisors and investors is our greatest asset. That is why we are committed to protecting your privacy and the confidentiality of your personal information. We are providing this Privacy Policy to you in an effort to explain our collection, use, retention and security of your personal information.

How We Gather Information

We collect your personal information in the process of establishing and administering your accounts.

1. Application information. When you open an account with a Loring Ward company, you provide information to us on your account application. This information may include your name, address, phone number, email address, Social Security number, and information about your investment experience, objectives, current investments, and information we may obtain from third-parties.
2. Transaction information. Any time you initiate a transaction in an account with us, we collect information about that transaction. We also keep information about your accounts with us, such as transaction history, current balances and current investments. These records also may include the application information listed above.

How We Use and Share Information

We share your personal information only for our everyday business purposes – such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus – and it is limited to those parties who assist us in establishing and administering your account.

We do not sell your personal information to anyone.

1. Use of information. We use your personal information to establish and administer your accounts, to alert you to services we provide, and to fulfill our regulatory obligations.
2. Sharing information for the purpose of providing service. We disclose your personal information to those parties who assist us in processing your transactions or otherwise providing service to your accounts. In order to improve the services we provide, we also may disclose personal information, such as transaction history and investment objectives, to other companies in the Loring Ward family.
3. Sharing information for legal purposes. In certain circumstances, we may share personal information as required or permitted by law. We may do so, for example, to cooperate with regulators or law enforcement authorities, to resolve consumer disputes, or for institutional risk control.

How We Protect Information

Even when we share your personal information, we remain committed to maintaining your privacy. We take steps to protect confidentiality of personal information whenever possible.

1. Contractual protections. We have contracts with all of our employees and with unaffiliated companies with whom we share personal information, prohibiting them from using such personal information for any purpose other than that for which it is disclosed, and further prohibiting them from disclosing it to any other parties.
2. Sharing with affiliates. We do not share personal information with affiliates unless it is necessary to service your accounts or as permitted by law.
3. Physical and procedural safeguards. We maintain physical, electronic, and procedural safeguards to protect the confidentiality of your personal information. We also restrict employee access to your personal information to those employees who need to know that information in the course of their job responsibilities.

Privacy Online

We consider privacy, security, and service in our online operations to be just as critical as in the rest of our business. We therefore employ all of the safeguards described above, along with the following Internet-specific practices.

We use a variety of proven protections to maintain the security of your online session. For example, we make extensive use of firewall barriers, encryption techniques and authentication procedures. We may also use “cookies” and similar files that may be placed on your computer’s hard drive for security purposes, to facilitate site navigation, and to personalize your experience on our site.

When you visit our website, we may collect technical and navigational information, such as computer browser type, Internet protocol address, pages visited, and average time spent on our website. This information may be used, for example, to alert you to software compatibility issues; or it may be analyzed to improve our web design and functionality.

When you visit password-protected areas of our website, we will require you to enter your individual login ID and password. In such cases, your browsing will no longer be anonymous to us. However, we will use your personal information only to provide you with account information or otherwise as listed above.

While we take active steps to protect all information we receive online, we cannot guarantee the security of any information you transmit to us via the Internet. Emails you send us are not necessarily secure when they are transmitted to us. Therefore, if your communication is very sensitive or includes highly confidential information such as a social security number or an account number, it may be prudent for you to use a method of transmission other than email or otherwise encrypt such information.

Other Information We reserve the right to change this Privacy Policy and any of the policies and procedures listed herein at any time. However, if at any time in the future it becomes necessary to disclose personal information in a way that is inconsistent with this Privacy Policy, we will give you advance notice of the proposed change and an opportunity to opt out of such disclosure. If you are a new customer, we can begin sharing your information 30 days from the date we sent this notice. When you are no longer our customer, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing. If you are a Vermont resident, we will automatically limit sharing of your information.

This Privacy Policy applies to services provided by Loring Ward. Third parties who provide you with financial services may have policies that differ from this one. You should contact those companies directly for more information. The examples and illustrations contained in this Privacy Policy are illustrations and are not intended to be exclusive.

If you have any questions or concerns regarding this Privacy Policy, please call Loring Ward at 1-800-366-7266.

In this Privacy Policy, the words “you” and “customer” are used to indicate any individual who obtains or has obtained a financial product or service from a Loring Ward company that is to be used primarily for personal, family, or household purposes. The words “personal information” are used to indicate any nonpublic information that identifies you or your accounts.

FORM ADV & BROKERCHECK

The Securities and Exchange Commission (the “SEC”) recently amended the content, delivery and filing requirements of Form ADV Parts 1 & 2. These documents describe the services, business practices and relationships of LWI Financial Inc. LWI Financial Inc. has recently updated both Parts 1 and 2 of Form ADV. Part 2 (the “Brochure”) is now available on the SEC’s website at www.adviserinfo.sec.gov along with Part 1, but if you would like to receive a free copy of either ADV Part 1 or Part 2 directly from LWI Financial Inc., please call 1-800-366-7266.

The Financial Industry Regulatory Authority (“FINRA”) maintains a free hotline and online tool known as BrokerCheck to help investors research the professional backgrounds of current and former FINRA-registered brokerage firms and brokers. FINRA’s BrokerCheck hotline number is 1-800-289-9999; BrokerCheck can also be accessed at FINRA’s website, www.finra.org. If you would like to receive a free brochure that includes information describing BrokerCheck directly from Loring Ward Securities Inc., please call 1-800-366-7266.

UPDATE YOUR INFORMATION

Should you have significant life changes, such as a marriage, birth of a child, change of contact information, death of a spouse, divorce, or a significant change in your financial situation, please contact your Advisor to determine if such changes will alter your investment objectives, risk tolerance, or investment horizon.

SIPC

Loring Ward Securities Inc., as a member of the Securities Investor Protection Corporation (“SIPC”), provides coverage for protection for securities and cash in accounts at Loring Ward Securities Inc. (including those held by clients of investment advisors) held at Pershing LLC. These accounts are insured by SIPC for securities and cash in the event of broker-dealer failure. SIPC provides up to \$500,000 of protection for accounts held in each separate capacity (e.g., trustee or sole owner), with a limit of \$250,000 for claims of cash balances. More information about SIPC coverage is available at www.sipc.org.

CODE OF ETHICS

Loring Ward maintains a Code of Ethics governing its relationship with investors. If you would like a free copy of our Code of Ethics or would like to discuss a complaint, please call 1-800-366-7266 and ask for the Compliance Department.

ANTI- MONEY LAUNDERING

As a result of the September 11, 2001 terrorist attacks all financial institutions, including Loring Ward and its affiliates, are subject to the USA PATRIOT Act (the “Act”). These institutions now, among other things, must verify the identity of all new investors, with certain limited exceptions, as defined in the Act. Verifying identity requires more than simply asking for information from a prospective investor. Institutions must ask for certain information, and must also verify the information provided through the use of available data and/or documents. The law also requires firms to monitor and report to the government suspicious activity in investors’ accounts. All investor information remains secure and subject to the Privacy Policy discussed herein.

While we take great care in attempting to know our investors’ individual investment goals and objectives today, the Act requires us to take additional steps to verify the identity of persons opening new accounts, including verifying the identity of prospective investors, consulting applicable government agency lists of known or suspected criminals, terrorists and terrorist organizations to determine if any of our prospective or current investors are on such list, and conducting, in certain circumstances, additional due diligence

when accounts are opened, including requesting information about the source of funds deposited into such accounts.

Loring Ward intends to comply with this and all other requirements of law, and we thank you for your assistance in meeting our obligations.

BUSINESS CONTINUITY PLAN

Loring Ward has developed a Business Continuity Plan (the “Plan”) designed to prevent or mitigate potential business disruption. Since the timing and severity of events that can lead to business disruption are unpredictable, our Plan is comprehensive, continually evolving, and practiced on an ongoing basis.

Our Plan is designed to safeguard our employees and property, protect the firm’s books and records, allow our advisors and clients to transact business, and communicate effectively with all stakeholders. Our Plan is also designed to ensure business is not disrupted and to permit our firm to resume business as quickly as possible if there is a disruption.

Our Plan addresses data back-up and recovery, critical technology and communications systems, financial and operational assessments, alternative communications with advisors, clients, employees and regulators, alternate physical locations for employees, critical suppliers and contractors, regulatory reporting, and ensuring prompt access to information if there is a business disruption.

Loring Ward’s objective is to have critical functions operational within one hour. However, in severe or widespread situations, operations could be delayed for a longer period of time. In the event of a disruption, we will notify you through regular communications on our website www.loringward.com or via email, if appropriate.

Emergency Contact

If after a business disruption you cannot contact us at 1-800-366-7266, please call our alternative number 1-800-988-3755 or visit www.loringward.com for information related to the business disruption including contact information as appropriate.

For More Information

If you have questions about our Plan, please contact Loring Ward’s Chief Information Officer at 1-800-366-7266.