

CHAO AND COMPANY, LTD.

PRIVACY POLICY NOTICE FOR MANAGED ACCOUNT CUSTOMERS

Chao and Company, Ltd. (the “Firm”) is committed to protecting its customer’s personal and financial information. This Privacy Policy Notice explains the manner in which the Firm collects, utilizes and maintains non-public personal information about its customers as required under Federal law.

Collection of Customer Information

The Firm collects personal information about customers mainly through the following sources:

- Application forms, customer questionnaires and other information provided by customers in writing, in person, by telephone, electronically or by any other means. This information includes name, address, date of birth, nationality, social security or other tax identification number, employment information, assets, income, and other financial and investment qualifications;
- Transactions relating to an account, including account balances, investments and withdrawals; and
- In some cases the Firm may collect information from consumer reporting agencies, such as your creditworthiness and credit history.

Disclosure of Nonpublic Personal Information

The Firm does not sell or rent customer information. The Firm does not disclose nonpublic personal information about its customers to nonaffiliated third parties or to affiliated entities, except as described herein or as otherwise permitted or required by law. For example, the Firm may share non-public personal information in the following situations:

- To service providers in connection with the administration and servicing of customer accounts (which may include attorneys, accountants, auditors and other professionals). The Firm may also share information in connection with the servicing or processing of account transactions;
- To employees and affiliates of the Firm in order to provide customers with ongoing advice and assistance with respect to the services provided to them by the Firm and to introduce them to other Firm services that may be of value to them (only under the limited conditions set forth under Regulation S-AM);
- To respond to a subpoena or court order, judicial process or regulatory authorities;
- To protect against fraud, unauthorized transactions (such as money laundering), claims or other liabilities; and

- Upon consent of a customer to release such information, including authorization to disclose such information to persons acting in a fiduciary or representative capacity on behalf of the customer.

Protection of Customer Information

The Firm's policy is to require that all employees, financial professionals and firms providing services on its behalf keep customer information confidential.

The Firm maintains safeguards to protect customer information. The Firm restricts access to the personal and account information of customers to those Firm personnel who need to know that information in the course of their job responsibilities. Third parties with whom the Firm shares customer information must agree to follow appropriate standards of security and confidentiality.

The Firm's privacy policy applies to both current and former Firm customers. The Firm may disclose non-public personal information about a former customer to the same extent as for a current customer.

Changes to Privacy Policy

The Firm may make changes to its privacy policy in the future. The Firm will not make any change affecting a customer without first sending such customer a revised privacy policy describing the change. In any case, the Firm will send each customer a current privacy policy at least once a year as long as he or she continues to be a customer of the Firm.