



Privacy Policy

Greenspring has adopted this policy with recognition that protecting the privacy and security of the personal information we obtain about our customers is an important responsibility. We also know that our customers expect us to service them in an accurate and efficient manner. To do so, we must collect and maintain certain personal information about them. We want our customers to know what information we collect and how we use and safeguard that information.

What Information We Collect

We collect certain nonpublic personal identifying information about our customers (such as their name, address, social security number, etc.) from information that they provide on applications or other forms as well as communications (electronic, telephone, written or in person) with them or their authorized representatives (such as their attorney, accountant, etc.). We also collect information about their brokerage accounts and transactions (such as purchases, sales, account balances, inquiries, etc.).

What Information We Disclose

We do not disclose the nonpublic personal information we collect about our customers to anyone except: (i) in furtherance of our business relationship with them and then only to those persons necessary to effect the transactions and provide the services that they authorize (such as broker-dealers, custodians, independent managers, etc.); (ii) to persons assessing our compliance with industry standards (e.g. professional licensing authorities, etc.); (iii) our attorneys, accountants, and auditors; or (iv) as otherwise provided by law.

We are permitted by law to disclose the nonpublic personal information about our customers to other third parties in certain circumstances (such as third parties that perform administrative or marketing services on our behalf or for joint marketing programs). These third parties are prohibited to use or share the information for any other purpose. If our customers decide at some point to either terminate our services or become an inactive customer, we will continue to adhere to our private policy, as may be amended from time to time.

Security of Our Customers' Information

We restrict access to our customers' nonpublic personal information to those employees who need to know that information to service their account. We maintain physical, electronic and procedural safeguards that comply with applicable federal or state standards to protect their nonpublic personal information.

Changes to our Privacy Policy or Relationship with our Customers

Our policy about obtaining and disclosing information may change from time to time. We will provide our customers with notice of any change to this policy before we implement the change.

Effective January 1, 2011