



ALHAMBRA INVESTMENT PARTNERS, LLC  
PRIVACY POLICY  
Effective as of July 1, 2006

We at Alhambra Investment Partners, LLC ("AIP") understand and appreciate that our clients are concerned about their privacy and about the confidentiality and security of information that we may obtain from them. This policy describes the steps we have taken to safeguard your information and what client information we may share to others. If you choose to become a client of AIP, you will need to give us certain personal information so we may open your account. We pledge our commitment to maintain the confidentiality of this information. This Privacy Policy applies to our current and former clients.

AIP may collect non-public personal information about you from the following sources:

- Information on your account application or other forms, including your name, address, Social Security number, marital status, assets, and income;
- Information about your investments and transactions with us, our affiliates and other financial institutions. This may include specific investments, account balances, and cash deposits and withdrawals; and
- Information we receive from consumer or other reporting agencies, employers or others.

AIP does not sell client information. AIP does not provide client information to persons or organizations who are doing business on their own behalf, for marketing purposes or otherwise.

AIP may disclose all of the information we collect, as described above, to agents, brokers and representatives who service you, and to companies as necessary to effect, administer, or process a transaction, or for maintaining or servicing your account.

Otherwise, AIP does not disclose any non-public personal information about our clients or former clients to anyone, unless authorized by the client or as required by federal or state law.

AIP restricts access to non-public personal information about you to those employees at AIP who need to know that information to provide the products or services to you. AIP maintains physical, administrative and technical procedural safeguards that comply with federal standards to guard your non-public personal information.

