

HENDERSON CAPITAL PARTNERS PRIVACY POLICY

The Gramm-Leach-Bliley Act directs financial services firms to establish and communicate a policy for defining and protecting the privacy of their clients and customers. In this regard, Henderson Capital Partners LLC (HCP) has developed the following statement of position regarding client privacy issues.

HCP must collect certain personal information in order to open customer accounts, to process customer transactions and to otherwise maintain appropriate levels of customer service. We understand that by selecting HCP, clients have entrusted us with private financial information and we are committed to protecting that trust. No private customer information is sold to any person or organization for any purpose.

Information Collected

The types of personal information collected by HCP include:

- Information provided by customers on new account applications and other forms.
- Information about a customer's transactions.
- Information obtained to verify a customer's identity.

Statement of Privacy Policy

It is the policy of HCP that:

1. No personal information is sold to any third parties.
2. Personal information may be disclosed to third parties under the following circumstances:
 - When personal information is needed to assist in processing or servicing customer transactions or accounts, including providing such information to outside organizations for the printing and mailing of trade confirmations and monthly account statements.
 - When such information assists us in providing customers with new services or products, in the development or maintenance of our computer systems, or in the distribution of important information from ourselves or from outside organizations.
 - When we believe in good faith that disclosure is required to comply with existing securities regulations and rules, relevant regulatory inquiries, or other circumstances as may exist under the law.
 - When a customer specifically asks us to do so in writing.
3. All Firm employees receive instruction regarding their responsibilities in matters involving privacy issues and are required to safeguard personal information.
4. Customer information is protected by the Firm's physical, electronic, and procedural safeguards.
5. If the Firm wishes to disclose customer information in a manner not consistent with this Policy, we will provide advance notice giving the client an opportunity to opt out of such disclosure.

Our Privacy Policy applies to all customers who are current or former HCP clients or who register for any of our services. HCP is committed to communicating our Privacy Policy. We will provide a copy of that Policy to our clients and subscribers on an annual basis. Customers who have further concerns about their personal account information (or who want to correct, update, or confirm their account information) can do so by writing Henderson Capital Partners LLC at One Kaiser Plaza, Suite 650 Oakland CA 94612 or by calling us at 510-835-0600 or by sending an e-mail message to hcp@hendersoncapital.com