

APPENDIX D

PRIVACY POLICY

All personal / private information furnished by Client shall be treated as confidential and will not be disclosed to third parties except as agreed to in writing or as required by law. Newground does not release personal Client information to anyone outside of Newground and its designated sub-advisors without Client's permission, except as authorized in the 'Limited Authorization and Release' section of our Advisory Agreement (which is as follows).

Limited Authorization and Release Regarding Other Advisors / Custodians

In order for Newground to conduct business on behalf of Client, permission is hereby granted for Newground Social Investment to contact Client's lawyers, accountants / CPAs, other financial advisors, banks, insurance agents, mutual funds, and/or custodians so as to gather or confirm information. This may include (but is not limited to) status of account transfers, current values, and cost basis of investment positions.

Client hereby instructs other custodians; brokers; investment firms; and investment, planning, insurance, and/or tax advisors to accept this clause as an instruction, authorization, and release; and further instructs them to cooperate promptly and fully with Newground Social Investment in the conduct of its business on behalf of Client.

How and Why We Obtain Information

Newground Social Investment ('Newground') collects information about you to help us serve your financial needs, provide customer service, and fulfill legal and regulatory requirements. Any collection of personal information is to support our normal business operations and to service your account(s).

Newground collects non-public personal and financial information about you from information you give us. The sources and the information collected may include:

- Information on applications and related forms such as: name, address, Social Security number, assets and income.
- Information regarding your transactions with us such as: products or services purchased, account balances and investments made.

Sharing Information

Newground does not disclose non-public personal information about you to anyone, except as agreed to in writing. However, in the course of servicing your account we may need to share information collected in order to provide account maintenance or customer service to your account (for example, with an attorney, tax professional, or our sub-advisors). We may be required to disclose your information to organizations such as governmental agencies and law enforcement officials if required under court order or by law.

Protecting Your Information

Newground maintains physical, electronic, and procedural safeguards to guard your non-public personal information, and to ensure we are complying with federal or state regulations.

Newground reserves the right to change this Privacy Policy at anytime without notice, but will notify clients of any modifications that may affect them.

Please do not hesitate to contact us with questions concerning this notice.

~ ~ ~