

MERITAGE PORTFOLIO MANAGEMENT, INC. PRIVACY POLICY

FACTS

WHAT DOES MERITAGE PORTFOLIO MANAGEMENT, INC. DO WITH YOUR PERSONAL INFORMATION?

Why?

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

What?

The types of personal information we collect and share depend on the service you have with us. This information can include:

- o Name, addresses, phone numbers, date of birth
- o Social security or other personal identification information
- o Detail about your assets, account balances and transfer instructions
- o Income and/or retirement needs
- o Investment activity and transactions
- o Information regarding accounts at other financial institutions

When you are no longer our client, we will continue to adhere to our privacy policy, as may be amended from time to time.

How?

All financial companies need to share clients' personal information to run their everyday business. In the sections below we list the reasons financial companies can share their client's personal information; the reasons Meritage Portfolio Management, Inc. (MPM) chooses to share; and whether you can limit this sharing.

| Reasons we can share your personal information | Does Meritage Portfolio Management Inc. share? | Can you limit this sharing? |
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| For our everyday business purposes - such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus. | Yes. MPM may share personal information described above for business purposes with a non-affiliated third party if the entity is under contract to perform transaction processing or services on behalf of MPM and otherwise as permitted by law. Any such contract entered by MPM will include provisions designed to ensure that the third party will uphold and maintain privacy standards when handling personal information. MPM may also disclose personal information to regulatory authorities as required by applicable law. | No. |
| For our marketing purposes - to offer our products and services to you. | Yes. MPM shares personal information for our marketing purposes as permitted by law. | Yes. |
| For joint marketing with other financial companies. | No. | We don't share. |
| For our affiliates' everyday business purposes - information about your transactions and experiences. | No. MPM has no affiliated entities. | We don't share. |
| For our affiliates' everyday business purposes - information about your transactions and experiences. | No. MPM has no affiliated entities. | We don't share. |
| For our affiliates' everyday business purposes - information about your creditworthiness. | No. MPM has no affiliated entities. | We don't share. |
| For nonaffiliates to market to you. | No. | We don't share. |

Questions?

Call (913)345-7000 or email contact@meritageportfolio.com

Who we are

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| Who is providing this notice? | Meritage Portfolio Management, Inc. |
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What we do

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| How does Meritage Portfolio Management protect my personal information? | To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards along with secured files and office premises. |
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| How does Meritage Portfolio Management collect my personal information? | <p>We collect your personal information, for example, when you:</p> <ul style="list-style-type: none"> o Complete account paperwork o Seek advice about your investments o Direct us as to specific security transactions o Give us your contact information o Give us your custodial account information |
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| Why can't I limit all sharing? | <p>Federal law gives you the right to limit only:</p> <ul style="list-style-type: none"> o Sharing for affiliates' everyday business purposes - information about your creditworthiness o Affiliates from using your information to market to you o Sharing for nonaffiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing.</p> |
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Definitions

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| Affiliates | <p>Companies related by common ownership and control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> o MPM has no affiliated financial or nonfinancial companies |
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| Nonaffiliates | <p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> o MPM may share personal information described above for business purposes with nonaffiliated third parties performing transaction processing or servicing on behalf of MPM and otherwise permitted by law. Such companies may include broker-dealers, banks, and trust companies. MPM may also share personal information with parties who provide technical support for our hardware and software systems and client-designated legal and accounting professionals. MPM does not share with nonaffiliates so that they can market their services or products to you. |
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| Joint marketing | <p>A formal agreement between nonaffiliated financial companies that will together market financial products or services to you.</p> <ul style="list-style-type: none"> o MPM does not jointly market with nonaffiliated financial companies. |
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