

NOTICE OF PRIVACY POLICY

PURPOSE OF THIS NOTICE

This notice provides information about the privacy policies and practices of Westport Strategies, LLC ("Westport"). Because your privacy is very important to us, we have adopted the following privacy policy regarding how the information you share with us is used and maintained. We do not sell your information to third parties. We also maintain policies and procedures that are intended to ensure the responsible handling of your "nonpublic personal information." The examples below of information we collect and the categories of parties with whom we share that information are intended to illustrate our information practices; they are not intended to be exhaustive. You do not need to take any action as a result of this notice, but you do have certain rights as described below.

OUR PRIVACY POLICIES AND PRACTICES FOR CONSUMERS AND CUSTOMERS

Information We Collect From Consumers and Customers

Westport may collect nonpublic personal information about consumers and customers from the following sources:

- Information we receive from an individual and his or her employer from reports summarizing his or her compensation and benefits, insurance applications, plan participation forms, and other related documents.
- Information based on an individual's history of transactions executed with the assistance of Westport, or others.

Information We May Disclose About Consumers and Customers

As permitted by law, we may disclose some or all of the information described above with companies or individuals that perform services necessary to effectuate transactions that an individual or his or her employer has requested, such as securities broker/dealers, investment advisors, rabbi trustees, insurance carriers, and insurance agents. With respect to current and former customers, we may also disclose some or all of the information described above to nonaffiliated third parties, which may include:

- Companies or individuals that perform services for us or on our behalf, such as independent contractors or technical system consultants who program our software.
- Companies that perform marketing services on our behalf or other financial institutions with which we have joint marketing agreements.
- Other nonaffiliated third parties, as permitted by law.

Westport's consultants are independent professionals who have chosen to affiliate with Westport. In the event your consultant leaves Westport, he or she is permitted to retain copies of your nonpublic personal information. If your consultant affiliates with a new firm, the consultant's subsequent use of your information will be subject to the new firm's privacy policy. If you are the owner of financial product(s) serviced by Westport and/or the corporate sponsor of a benefit plan serviced by Westport, and you do not want your Westport consultant to retain this information after he or she leaves, or Westport to transfer this information to his or her new firm, please contact 1-781-848-1212 to opt out of this information sharing. Your opt-out will become effective no later than 30 days from the date of your call.

Our Practices Regarding The Confidentiality and Security of Consumer and Customer Information

We restrict access to nonpublic personal information about our current or former customers and consumers to those authorized individuals who need to know that information in order to provide them with products or services. We also require outside companies and independent contractors who provide services on our behalf or with whom we have entered a joint marketing agreement to enter into agreements that protect the confidentiality of any customer information we provide and restrict the use of such information to those purposes. Finally, we maintain physical, electronic, and procedural safeguards that comply with federal regulations to guard customers' and consumers' nonpublic personal information.

This Notice of Privacy Policy was last updated January 2011.

SECURITIES INVESTOR PROTECTION CORPORATION DISCLOSURE

The Securities Investor Protection Corporation ("SIPC")

To obtain more information about SIPC, as well as obtain a SIPC brochure you may contact SIPC directly at (202) 371-8300 or by directly visiting their website at www.sipc.org