

LVM'S PRIVACY NOTICE

The confidentiality of your personal information is important to LVM Capital Management, Ltd. You have chosen to do business with LVM, and LVM guards that relationship with great care, beginning with the information you have chosen to share with us. You can be confident that your financial privacy is a priority of LVM. LVM is required by law to give you this Privacy Notice to explain how LVM collects, uses, and safeguards your personal financial information. If you have any questions, please contact an LVM representative at 269.321.8120.

LVM's Limited Disclosure of Nonpublic Personal Information

LVM does not disclose nonpublic personal information to non-affiliated third parties, except to custodians, broker-dealers, and sub-advisors as necessary to carry out the terms of the Investment Advisory Agreement with each client. Although not disclosed by LVM, this information may be accessible to computer hardware and software vendors when they update or maintain LVM's computer systems. Other disclosure may occur if required by the SEC, NASD, or other regulator, required to be disclosed by law, or as may be necessary or helpful for resolving disputes, clearing trades, or enforcing the Investment Advisory Agreement.

The categories of non-affiliate third parties to whom information is disclosed is limited to the custodians, broker-dealers, and sub-advisors engaged by the client or LVM for purposes of carrying out the transactions set forth in the Investment Advisory Agreement or to financial planners, attorneys, CPAs, or other advisors engaged by the client.

Types of Information Collected

"Nonpublic personal information" is information regarding a client that LVM obtains in connection with providing its investment advisory services. LVM does collect information regarding clients in the following categories:

- information about the client
- information about the client's transactions with LVM or its affiliates
- information about the client's transactions with non-affiliated third parties

Security Procedures

To maintain security of nonpublic personal information, LVM restricts access to client and account information to persons who need to know that information to provide a client with investment advisory services. LVM's employees are trained in the importance of maintaining confidentiality and client privacy. All LVM employees sign confidentiality agreements. LVM uses physical, electronic, and procedural safeguards that are consistent with sound industry practice to safeguard nonpublic client information.

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LVMcapital
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