

PRIVACY POLICY

Kessler Investment Advisors, Inc., Kessler & Company Investments, Inc. and their affiliates (collectively, “Kessler”) are committed to maintaining the confidentiality and security of information that we collect from our customers.

WHAT DOES KESSLER DO WITH YOUR PERSONAL INFORMATION?

Why?

Kessler is providing this privacy policy notice because 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. This privacy notice describes what types of personal information we collect, why it is shared, how we protect it and the circumstances under which we may share it with others. We may change our privacy policy at any time upon notice to you. Please read this notice carefully to understand what we do.

What?

Depending on the product or service you have with us, the types of personal information we collect and share can include:

- Names and addresses when that information is included in whole or in part from nonpublic personal information, such as a new account form
- Social Security number, income and net worth
- Account numbers and trading history
- Any and all financial information obtained from the customer

When you are no longer our customer, we may continue to share your information with your designated agent or other parties that you authorize.

How?

All financial companies need to share customers’ personal information to run their everyday business. In the section below, we list the reasons Kessler can share its customers’ personal information; the reasons Kessler chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information. We only use information about you and your account (i) for our everyday business purposes—such as to process your transactions, maintain your account(s), respond to court orders and legal investigations or otherwise to help us better serve your investment needs, (ii) for our marketing purposes, such as to suggest services, educational materials or offer products and services that may be of interest to you, (iii) for our affiliates’ everyday business purpose to provide business services to service your account (iv) for our affiliates to market to you and (v) for non-affiliates to process your transactions, provide

business services to, or on behalf of, Kessler to service your account.

Accordingly, Kessler restricts disclosure of nonpublic personal information about you to Kessler employees who need to know that information to provide you products or services, affiliates, and non-affiliated parties as described above. We also may share personal information with your designated agent or other parties that you authorize. Kessler does not sell personal nonpublic information about current or former customers to any third-parties. Kessler will share nonpublic personal information with third parties as required and permitted by law.

HOW KESSLER HANDLE YOUR PERSONAL INFORMATION?

How Does Kessler Protect My Personal Information?

To protect your personal information from unauthorized access and use, Kessler uses security measures that comply with federal law. Kessler maintains physical, electronic and procedural safeguards to guard your personal account information, including computer safeguards and secured files and buildings. These safeguards are incorporated in policies that are not fully described herein. We require all non-affiliated parties to conform to our privacy standards and are contractually obligated to keep information provided confidential and use as requested. Furthermore, Kessler will continue to adhere to the privacy policies and practices described in this notice even after your account is closed or becomes inactive.

How Does Kessler Collect My Personal Information?

We may collect your personal information from the following sources:

- Information we receive from you when you open an account, on applications, other forms, or telephone conversations with you; and
- Information about your transactions with us, our affiliates, or others.

We also collect your personal information from others, such as non-affiliated sources, affiliates or other companies.

Why Can't I Limit All Sharing?

Federal law gives you the right to limit only:

- Sharing for affiliates' everyday business purposes—information about your creditworthiness
- Affiliates from using your information to market to you
- Sharing for non-affiliates to market to you

State laws and individual companies may give you additional rights to limit sharing.

QUESTIONS?

Please let us know if we can answer any questions that you may have regarding our privacy policies. You may contact us via e-mail at majohnson@kesslercompanies.com or by telephone at 303-291-8451.

WHO WE ARE

This privacy notice is provided on behalf of Kessler Investment Advisors, Inc. and Kessler & Company Investments, Inc. and is issued pursuant to federal statutory and regulatory requirements. You may have additional rights under other foreign or domestic laws that may apply to you.

Definitions: "Affiliates" means companies related by common ownership or control. They can be

financial and non-financial companies. Currently, Kessler is comprised of two operating affiliates, Kessler Investment Advisors, Inc., and Kessler & Company Investments, Inc. They are commonly owned by The Kessler Companies, Inc., a holding company that does not engage in trading or other commercial activities and does not share any customer's personal information with third parties.

"Non-affiliates" means companies not related by common ownership or control. They can be financial and non-financial companies.