



Coltrane Securities is a division of Coordinated Capital Securities, Inc. (CCS). CCS strongly believes in protecting the confidentiality and security of information we collect about you. This notice describes our privacy policy and describes how we treat the information we receive about you.

**COLTRANE
SECURITIES**

PRIVACY POLICY STATEMENT

Why We Collect And How We Use Information.

When we evaluate your request for our services, provide investment advice to you and process transactions for your account, you typically provide us with certain personal information necessary for these transactions. We may also use that information to offer you other services we provide which may meet your investment needs.

What Information We Collect.

The personal information we collect may include: name and address; employer; social security number or tax payer identification number; assets; income, account investment positions and balance; investment objectives; investment transactions; accounts at other institutions; the identities of accountants, attorneys and other professionals you engage; information we receive from third parties, including credit bureaus; and information we obtain to verify your representations to us, such as your identity or assets.

We Limit How, and With Whom We Share Your Information.

We do not sell your personal information to anyone. We may disclose information about you to our employees, affiliates, registered representatives, their affiliated businesses, and third parties who provide you with financial products and services when completing a transaction at your request or when providing other services to you. At your request, we may disclose information to nonaffiliated third parties but only when completing a transaction at your request or providing our other services to you. Nonaffiliated third parties may include retirement plan sponsors or third party administrators, mutual fund companies, insurance companies and agencies, other broker-dealers and clearing firms, accountants, lawyers, securities professionals and others to assist us, or them, in providing services to you.

We may also share information with companies that perform services on our behalf, such as the companies that we hire to perform marketing or administrative services. Companies we may hire to provide support services are not allowed to use your personal information for their own purposes. We may make additional disclosures as permitted by law.

How We Protect Information.

We treat information about current and former clients and their accounts in a confidential manner. Employees and our registered representatives are required to comply with our established information confidentiality provisions. We also

maintain physical, electronic, and procedural safeguards to protect information.

Access to and Correction of Your Information.

Upon your written request, we will make available your information for review. Information collected in connection with, or in anticipation of, any claim or legal proceeding will not be made available. If your personal information with us becomes inaccurate, or if you need to make a change to that information, please contact us at the number shown below so we can update our records. Also, if you believe someone has accessed your account without authorization, please contact us as soon as possible.

Annual Written Notice.

We will reaffirm this policy annually in writing, as long as you maintain an on-going relationship with us. While this policy may change from time to time you can always review our current policy online at www.coltrane.com.

Further Information.

For additional information regarding our privacy policy, or if you have any questions and/or concerns about your account or about our services, please contact us by writing to us at 706 River Place Commerce Center III, Madison, Wisconsin 53716 or calling 608-222-4242.

We also wish to advise you that the Financial Industry Regulatory Authority (FINRA) Public Disclosure Program provides information to investors about the background, business practices and conduct of FINRA members, such as CCS. More information about the FINRA Program can be obtained at www.finra.org or by calling the FINRA hotline at (800)289-9999.

SIPC MEMBERSHIP

Our firm is a member of the Securities Investor Protection Corporation (SIPC). SIPC protects the clients of its member firms against the loss of their securities in the event of the member's insolvency and liquidation. For more information on SIPC coverage, please see the explanatory brochure at www.sipc.org or contact SIPC at (202)371-8300.

TAX COST BASIS REPORTING CHANGES EFFECTIVE JANUARY 1, 2011

Beginning with the 2011 tax year, a significant legislative change goes into effect that will impact information reported to the IRS on your behalf.

This new reporting requirement to the IRS include the dispositions of **covered** securities that occur on or after their effective date. A **covered** security is any security purchased or acquired on or after the following effective dates:

Equity securities:

acquired on or after January 1, 2011

Mutual fund and dividend reinvestment plan (DRIP) shares: *acquired on or after January 1, 2012*

Debt securities, options and all other financial instruments: *acquired on or after January 1, 2013*

In accordance with current Federal tax regulations, our firm's default method is FIFO (First In First Out). To provide you the flexibility to set an alternative relief method on an account-by-account basis, our clearing firm First Clearing, LLC will support a number of different tax lot relief methods beginning with the 2011 tax year.

When using specific tax strategies, you need to be aware of the tax consequences of your trading activity throughout the entire year.

Effective January 1, 2011, new IRS regulations dictate that changes to tax lots will not be permitted after the settlement date of the closing transaction.

You should consult with your tax advisor to determine the best tax lot relief method for you.

If you would like to sell a specific tax lot, please let the trading desk know at the time of the trade.