

Charter Investment Advisors, Inc.

Privacy Policy

Originally drafted June 26, 2001

1. **Charter does not sell your personal information to anyone.**
2. We must collect personal information once you decide to use our management services. Generally, we obtain information from the following sources:
 - a. Information you provide on our management agreement.
 - b. Information provided on forms and applications required by your broker/custodial firm.
 - c. Information provided to us by your broker/custodian for all account activity, including your transactions, balances, positions and history.
3. The information we collect may include your name, address, phone number(s), E-mail address, Social Security number, brokerage account number(s), tax information, employer and other personal data.
4. We will not intentionally disclose information to third parties, unless you have previously approved or been notified of information sharing. All clients will have the option to prohibit Charter from distributing any confidential information. However, we may disclose personal information in limited circumstances to fulfill regulatory obligations or as required under applicable law. Charter is regulated by various states and the Securities and Exchange Commission.
5. We will provide notice of changes in our information-sharing practices. If at any time it is necessary to disclose any of your personal information in a way that is inconsistent with our policy, we will give advance notice of the proposed change so that clients will have the opportunity to opt out of such disclosure.
6. If you choose to utilize Charter's affiliated real estate brokerage company (Pro-Star Realty LLC), it is possible that information that is normally considered confidential by CIA may be shared only with this affiliated company.
7. We authorize access to personal information only for those employees who need to know that information as part of their job responsibilities. Employees may access your information for business purposes only. All employees are trained to protect the confidentiality of your information.
8. Charter strives to monitor the security and privacy policies of client-designated brokers/custodians and other data vendors. However, Charter cannot assume responsibility for any security lapse experienced by these vendors.
9. The security practices described in this notice apply equally to current and former clients. However, we will not provide annual notice of our privacy policy to a client after an account relationship is terminated. Although the length of time that we keep personal information on former clients may be governed by the SEC or other regulatory agencies, information about former customers may be eventually removed from our records and destroyed as regulations permit.

If you have any questions or concerns, please contact us at 407-226-1112