

Privacy Policy

The Company has adopted the following privacy policy:

This Privacy Policy sets forth our policies with respect to non-public personal information of our shareholders and former shareholders. These policies apply to individuals only and may be changed at any time, provided a notice of such change is provided to you.

You may provide us from time to time with personal non-public information about you, such as your address, your social security number, and information about your family.

We do not disclose your personal non-public information to anyone, except as follows:

• We may disclose your personal non-public information if you direct us to do so, or if we are required by applicable law to do so.

We seek carefully to safeguard your private information and, to that end, we restrict access to nonpublic personal information about you to those employees who need to know the information to enable us to provide services to you. None of your personal, non-public information may be accessed by anyone on our website.

A copy of the Privacy Policy will be mailed to the shareholders annually with the annual report to shareholders.