

# **BARRINGTON ASSET MANAGEMENT, INC.**

## **CUSTOMER PRIVACY POLICY**

Barrington Asset Management, Inc. has a long-standing commitment of protecting the confidentiality and security of information we collect from our clients. It is our policy that we do not share nonpublic information about you outside of Barrington Asset Management, Inc. without your consent except for the specific purposes described below, in accordance with all applicable laws. The following describes the information we may gather and the circumstances under which it may be disclosed.

### **Collection of Information**

In conducting our business and providing our clients with products and services, we collect nonpublic personal information ("Information") about our clients. This Information includes information we receive from you on applications or other forms; information about your transactions with us, our affiliates, or others; and information we receive from nonaffiliated third parties (e.g. consumer reporting agencies).

### **Disclosure of Information**

We do not disclose Information about our clients or former clients to any nonaffiliated third parties, except as permitted by applicable law or regulation. We may share Information with affiliates of Barrington Asset Management, Inc., as well as with nonaffiliated companies that perform various services such as transfer agents, custodians, broker/dealers and other service firms and financial institutions with whom we have relationships. We may also share Information with nonaffiliated companies with which we have joint marketing agreements, such as an agreement with another broker/dealer or registered investment adviser enabling us to offer you certain of its products or services.

### **Protection of Information**

All employees are required to protect the confidentiality of Information and to comply with our established policies. We restrict access to Information about you to those employees who need to know that Information to provide products or services to you. We maintain physical, electronic, and procedural safeguards, within the applicable laws, to guard your Information.

### **Affiliates of Barrington Asset Management, Inc.**

The following companies are under common control with Barrington Asset Management, Inc.:

Barrington Research Associates, Inc.  
Barrington Opportunity Fund Management, LLC  
Barrington Opportunity Fund, LP  
HMR Publishing Company, Inc.

### **Further Information**

For questions concerning Barrington Asset Management, Inc.'s Privacy Policy, write us at Barrington Asset Management, Inc., Attn: Compliance Department, 161 N. Clark Street, Suite 2950, Chicago, Illinois 60601, or telephone Gregory Paris at (312) 634-6000. We reserve the right to change this Privacy Policy at any time.