

KRASNEY FINANCIAL, LLC

PRIVACY NOTICE

Krasney Financial, LLC (referred to as “KF”) maintains physical, electronic, and procedural safeguards that comply with federal standards to protect its clients’ nonpublic personal information (“information”). Through this policy and its underlying procedures, KF attempts to secure the confidentiality of customer records and information and protect against anticipated threats or hazards to the security or integrity of customer records and information.

It is the policy of KF to restrict access to all current and former clients’ information (i.e., information and records pertaining to personal background, investment objectives, financial situation, tax information/returns, investment holdings, account numbers, account balances, etc.) to those employees and affiliated/nonaffiliated entities who need to know that information in order to provide products or services to the client. KF may disclose the client’s information if KF is: (1) previously authorized to disclose the information to individuals and/or entities not affiliated with KF, including, but not limited to the client’s other professional advisors and/or service providers (i.e., attorney, accountant, insurance agent, broker-dealer, investment adviser, account custodian, etc.); (2) required to do so by judicial or regulatory process; or (3) otherwise permitted to do so in accordance with the parameters of applicable federal and/or state privacy regulations. The disclosure of information contained in any document completed by the client for processing and/or transmittal by KF in order to facilitate the commencement/continuation/termination of a business relationship between the client and a nonaffiliated third party service provider (i.e., broker-dealer, investment adviser, account custodian, insurance company, etc.), including information contained in any document completed and/or executed by the client for KF (i.e., advisory agreement, client information form, etc.), shall be deemed as having been automatically authorized by the client with respect to the corresponding nonaffiliated third party service provider.

KF permits only authorized employees and affiliates who have signed a copy of KF’s Privacy Policy to have access to client information. Employees violating KF’s Privacy Policy will be subject to KF’s disciplinary process. Additionally, whenever KF hires other organizations to provide services to KF’s clients, KF will require them to sign confidentiality agreements and/or the Privacy Policy.

Should you have any questions regarding the above, please contact Jonathan Krasney, Chief Compliance Officer.

INITIAL PUBLIC OFFERING (IPO) POLICY

On occasion, Krasney Financial LLC (“KF”), through its clearing/custodial firm relationships, may have limited access to IPO shares. Except with respect to the limited exception noted below, KF generally does not purchase and/or recommend for purchase IPOs for its individual client accounts. The limited exception to the above policy is: (1) for initial public offerings of large recognized company securities (i.e. UPS, Google, etc.), and only to the extent that: (a) KF first determines such IPO is suitable for its clients; and, (b) the IPO is available through its existing clearing/custodial firm relationships; or (2) for those individual clients of KF who, on a completely unsolicited basis, contact KF to request that KF purchase a specific IPO for his/her/their/its account, to the extent same has been made available to KF. In the event of any such unsolicited request(s), KF, after first determining that the client is *qualified* for such specific IPO (i.e., suitable for the client relative to the client’s investment objectives, financial situation and current asset allocation), *may* (to the extent possible under the circumstances) purchase such IPO on a pro-rata basis with other unsolicited client requests. To the extent applicable under the circumstances, KF will use reasonable efforts to allocate available IPO shares on a fair and equitable basis in accordance with the terms and conditions of the aforementioned policy.

KRASNEY FINANCIAL LLC
PROXY VOTING POLICY

Krasney Financial LLC (“KF”) does not vote client proxies. Therefore, although KF may provide investment advisory services relative to client investment assets, KF clients maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client’s investment assets. KF and/or the client shall correspondingly instruct each custodian of the assets to forward to the client copies of all proxies and shareholder communications relating to the client’s investment assets. Any questions regarding KF’s proxy voting policy shall be directed to Jonathan Krasney, Chief Compliance Officer of KF, at (973) 543-6660.