

Curran Investment Management & Curran Advisory Services' Privacy Notice

Curran Investment Management ("CIM"), an investment adviser registered under the Investment Advisers Act of 1940, as amended, and Curran Advisory Services ("CIMAS"), a registered broker-dealer and member of the Financial Industry Regulatory Authority (FINRA), are committed to excellence in connection with all aspects of their respective businesses, including the protection of your privacy. Throughout our relationship with you, we collect important, non-public, personal information. We want you to know that we have implemented a number of important practices for safeguarding the privacy and security of this information.

Summary:

- We do not sell your personal information to any third party for marketing reasons or for any other reason.
- It is our practice to safeguard the systems and records that contain your personal, non-public information.
- Our employees receive training about privacy issues and are required to safeguard your personal information.
- Our privacy policy is not just limited to our existing and prospective clients; it is also extended to our former clients.

How we collect non-public, personal information:

We collect certain non-public, personal information about you through your completion of certain documents and questionnaires. This information includes, but is not limited to, the following: name, address, social security number, date of birth, telephone number, assets, liabilities, income, net worth and investment experience and/or information about your investment and securities transactions. These records are gathered in our effort to provide you with the most customized personal service and in accordance with our regulatory requirements. We limit our collection and use of your information to such information that we believe is necessary to achieve compliance with our regulatory requirements and support our delivery of superior service to you.

How we protect your non-public, personal information:

We maintain physical, electronic and procedural safeguards that comply with federal standards to guard your non-public, personal information. We permit only authorized individuals, who are trained in the proper handling of such information and who need to access this information to do their jobs, to have access to this information.

How we use personal information:

We do not disclose any non-public, personal information about our clients or former clients to anyone except as permitted by applicable law or required by regulation.

Consistent with applicable law, CIM and CIMAS may share your information with each other. Further, we may verify certain required information from consumer reporting agencies to better understand your financial needs and satisfy our compliance requirements. We will, however, only share information with third parties who have agreed in writing to maintain the confidentiality and privacy of any information shared. We also reserve the right to hire third party vendors who, depending on the service provided, may receive from us your personal information in connection with their providing a service necessary for the handling of your account or otherwise to us. In each such case, we will require that each such third party agree, under a joint agreement, to protect your privacy and to use such information only for the purposes for which we disclose the information to them.

As stated above, CIM and CIMAS may share your personal information with each other. For marketing purposes, the personal information that would be shared is limited to your name and address. If your accounts are only held at CIM, you may limit CIMAS from marketing their products or services to you based on your personal information. If your accounts are only held at CIMAS, you may limit CIM from marketing their products or services to you based on your personal information. To limit or opt out of marketing offers, contact us at 518-391-4200 or by calling our toll free number, 866-432-1246. You may also email us at info@curranllc.com. The opt-out provision will remain in effect for at least five (5) years.

How we keep your information current:

It is important that we maintain accurate information about you. If you note a discrepancy in the information that we have on file for you, please let us know immediately.

Additional information:

Protecting your privacy is of paramount importance to us. For more information on our privacy policy, please contact us at (518) 391-4200. Any material changes to this policy will be made available to you. You are always welcome to request that we provide to you our most current privacy policy by contacting us at the above telephone number, or by sending a request to our home office in writing. Should you feel that your privacy has been compromised, please contact CIM's/CIMAS' Chief Compliance Officer immediately at (518) 391-4200.

CIMAS' Business Continuity Plan

Background:

CIMAS, LLC is responsible for creating and has developed a business continuity plan which addresses how we will respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions is unpredictable, we will have to be flexible in responding to actual events as they occur. With that in mind, we are providing you with this information on our business continuity plan.

Contacting Us:

If after a significant business disruption you cannot contact us as you usually do at (518) 391-4200 or (866) 432-1246 (or www.curranllc.com or info@curranllc.com), you should call our alternative number (518) 465-5374 (or email us at curranllc@hotmail.com). If you cannot access us through either of those means, in an emergency, you may contact our clearing firm, National Financial Services, at (800) 801-9942 for access to your funds and securities as well as placing sell orders in the event of an emergency.

Our Business Continuity Plan:

We plan to quickly recover and resume business operations after a significant business disruption and respond by safeguarding our employees and property, making a financial and operational assessment, protecting the firm's books and records, and allowing our customers to transact business. In short, our business continuity plan is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption.

Our business continuity plan addresses: data back up and recovery; all mission critical systems; financial and operational assessments; alternative means of communications with customers, employees, and regulators; alternate physical location of employees; critical supplier, contractor, bank and counterparty impact; regulatory reporting; and assuring our customers prompt access to their funds and securities if we are unable to continue our business.

Our clearing firm, National Financial Services, backs up our important records in a geographically separate area. While every emergency situation poses unique problems based on external factors, such as time of day and the severity of the disruption, we have been advised by our clearing firm that its objective is to restore its own operations and be able to complete existing transactions and accept new transactions as soon as practicable. Your orders and requests for funds and securities could be delayed during this period.

Our business continuity plan is reviewed at least annually and is subject to change. In the event that our plan is changed to a material extent, this disclosure statement will be promptly updated and communicated to customers and is always available upon request.

Varying Disruptions:

Significant business disruptions can vary in their scope, such as only our firm, a single building housing our firm, the business district where our firm is located, the city where we are located, or the whole region. Within each of these areas, the severity of the disruption can also vary from minimal to severe. In a disruption to only our firm or a building housing our firm, we will transfer our operations to a local backup site when needed. In a disruption affecting our business district, city, or region, we will transfer our operations to a site outside of the affected area, and recover and resume business as soon as possible. In either situation, we plan to continue in business, and notify you through our website (www.curranllc.com), electronic mail or our customer emergency number, (518) 465-5374 how to contact us. If the significant business disruption is so severe that it prevents us from remaining in business, we will assure our customer's prompt access to their funds and securities.

Even though we have committed ourselves to develop, implement and test our business continuity plan, there is no guarantee that the systems that we rely on will always be available or that we will recover from a significant business disruption.

For more information - If you have questions about our business continuity planning, you can contact us at (518) 391-4200 or (866) 432-1246 (or info@curranllc.com).

Payment for Order Flow/Order Routing

The following statement is provided to you as required by Rule 11Ac1-3 of the Securities and Exchange Act of 1934:

CIMAS utilizes National Financial Services ("NFS") as a clearing firm and, accordingly, all CIMAS securities transaction orders are submitted to NFS for execution. CIMAS does not route orders to a specific market maker, but depends on NFS to make this determination. NFS and its affiliates are compensated for directing order flow. Although CIMAS receives a portion of the commission attributable to each buy and sell transaction, it does not receive any payment for order flow or other compensation for directing orders in this manner.

NFS may receive remuneration, compensation, or other consideration from particular broker/dealers or market centers for directing customer orders for securities to them for execution. Such consideration may take the form of financial credits, monetary payments or reciprocal business. More information on NFS's order-routing procedures is available at www.nationalfinancial.com.

Customer Identification Program Notice

To help the government fight the funding of terrorism and money laundering activities, federal law requires financial institutions to obtain, verify, and record information that identifies each person who opens an account. This Notice answers some questions about your firm's Customer Identification Program.

What types of information will I need to provide?

When you open an account, we are required to collect information about you such as your name, date of birth, address, identification number:

- U.S. Citizen: taxpayer identification number (social security number or employer identification number)
- Non-U.S. Citizen: taxpayer identification number, passport number, and country of issuance, alien identification card number, or government-issued identification showing nationality, residence, and a photograph of you.

You may also need to show your driver's license or other identifying documents.

A corporation, partnership, trust or other legal entity may need to provide other information, such as its principal place of business, local office, employer identification number, certified articles of incorporation, government-issued business license, a partnership agreement, or a trust agreement.

U.S. Department of the Treasury, Securities and Exchange Commission, FINRA, and New York Stock Exchange rules already require you to provide most of this information. These rules also may require you to provide additional information, such as your net worth, annual income, occupation, employment information, investment experience and objectives, and risk tolerance.

What happens if I don't provide the information requested or my identity can't be verified?

CIMAS may not be able to open an account or carry out transactions for you. If we have already opened an account for you, we may have to close it.

Complaints

We strive to meet and exceed our clients' needs. Should an issue arise, complaints may be directed to:

Chief Compliance Officer
c/o Curran Advisory Services
30 S. Pearl Street
Albany, NY 12207

FINRA Broker Check

FINRA makes available to the public certain information regarding firms and their registered employees. An investor brochure is available at www.finra.org. The Broker Check Hotline toll free number is (800) 289-9999.