

Chronim Investments DBA Snider Advisors and DBA Chrisilis is required by law to inform our clients of our policies regarding privacy of client information. We are committed to keeping the personal information collected from our potential, current and former clients confidential and secure. Your privacy is one of our greatest concerns. We hold all personal information provided to our firm in the strictest confidence. We want to be sure that you know why we need to collect personal information from you. We also want to explain to you our commitment to protect the information you provide us. **We never sell your information to any outside parties.**

This privacy statement takes the place of any previous policies issued by Chronim Investments and is subject to change.

The Information We Collect

We collect certain personal information whenever you voluntarily provide it, such as when you complete an online form to request information about our products or services, register for one of our investment education courses or sign up for our financial services. We collect and keep only information that is necessary for us to provide services requested by you and to administer your business with us. Chronim Investments will internally safeguard your nonpublic personal information by restricting access to only those employees who provide products or services to you or those who need access to your information to service your account. We may collect nonpublic personal information:

- From you when you complete an application, our discussion with you, data gathering forms or other forms. This includes information such as name, address, Social Security number, assets, income, net worth, copies of financial documents and other information deemed necessary to evaluate your financial needs and objectives, or
- As a result of transactions with us, our affiliates or others. This could include transactions completed with us, information received from outside vendors to complete transactions or to achieve financial goals.

Our websites contain an invitation to join our email list for newsletters and/or announcement/special offers. If you join our email list, you will receive emails containing the information you requested. If you no longer wish to receive these emails, instructions on how to unsubscribe from the list are located at the bottom of each email.

Who has Access to this Information?

We only share your nonpublic personal information with nonaffiliated companies or individuals as permitted by law, such as your representative within our firm, affiliated securities firms, mutual funds, insurance companies and other product vendors, or to comply with legal or regulatory requirements. We also, with your approval, may share information with your advisors, which can include your accountant and/or attorney. Your authorization of us to conduct investment activities on your behalf and your

continuing relationship with us acts as your consent to our disclosure of your non-public personal information when such disclosure is necessary to conduct such activities. In the normal course of our business, we may disclose information we collect about you to companies or individuals that contract with us to perform servicing functions such as:

- Recordkeeping
- Computer-related services
- Good-faith disclosure to regulators who have regulatory authority over the company

Companies we hire to provide support services are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of your personal information to the performance of the specific service we have requested.

We do not provide your personally identifiable information to mailing list vendors or solicitors for any purpose.

When we provide personal information to a service provider, we require these providers to agree to safeguard your information, to use the information only for the intended purpose and to abide by applicable law.

Protecting the Confidentiality and Security of Current and Former Clients' Information

We retain records relating to professional services that we provide so that we are better able to assist you with your professional needs and, in some cases, to comply with professional guidelines. In addition, we will maintain reasonable physical, electronic and procedural safeguards that meet federal and/or state standards to guard your nonpublic personal information. Your nonpublic information is protected by physical (restricted access, shredding of discarded documents) and electronic (password protection of sensitive files, encryption, and online access to order placement or account records) safeguards.

Access to Your Information

Alumni and clients may access, and if necessary, update their personal information via the password protected web sites at www.snideradvisors.com or www.chrisilis.com.

Websites

Chronim Investments considers privacy, security and service to be just as critical online as well as offline. We use a variety of proven protections to safeguard your online session. We make extensive use of firewall barriers, encryption techniques and authentication procedures. We also use cookies and similar files that may be placed on your hard drive for security purposes and to personalize your experience on our site. When we conduct business online, we may collect technical and navigational information, such as computer browser type, Internet protocol address, pages visited, and average time spent on our websites. This information may be used to alert you to software compatibility issues, or it may be analyzed to improve our websites' design and functionality. We use this information to help us make the site more useful to visitors, to learn more about the number of visitors to our sites, and to learn

about the types of technology our visitors use. Unless it is specifically stated otherwise, no additional information will be collected about you.

Email

Should you send us your questions and comments via email to any mailbox provided by Chronim Investments, we will share your correspondence with our Investment Advisor Agents and those employees or agents most capable of addressing your questions and concerns. We will retain your communication until we have done our very best to provide you with a complete and satisfactory response. Ultimately, we will either discard your communication or archive it according to Chronim Investments' requirement under applicable securities laws.

Please note that, unless we expressly advise you otherwise, Chronim Investments' email facilities do not provide a means for completely secure and private communications between Chronim Investments and you, the User. Although every attempt will be made to keep your information confidential, from a technical standpoint, there is still a risk. For that reason, please do not use email to communicate information to us that you consider to be confidential. If you wish, you may contact us instead via telephone or by facsimile. Additional security is available to you if you equip your Internet browser with 128-bit "secure socket layer" encryption, which provides more secure transmissions.

Chronim Investments generally will not send unsolicited emails asking for personal or account information, such as Social Security numbers or account numbers. In most instances, we will not send you emails unless you have initiated an email dialogue with us, you have previously requested us to communicate with you in this manner, or the email is about your relationship with Chronim Investments.

Facsimile

We will only send a fax to you if you have authorized this form of communication by giving us your fax number.

Links to Other Web Sites

The Chronim Investments websites (www.snideradvisors.com and www.chrisilis.com) contain links to other websites. Please be aware that we are not responsible for the privacy or security practices of other websites. We encourage our users to be aware of when they leave one of our websites and to read the privacy statements of each and every website that collects personal information. We also encourage our users to review the Privacy Policies of our service providers available on their websites.

Notification of Changes

The most recent version of our privacy policy is available on our websites. Please refer to it and stay informed about the information we collect, how we use it, and when and why we may disclose it.