

Wayne Hummer Privacy Statement

Our Privacy Pledge to You

Our clients are our most valuable asset. You trust us to discreetly handle your private financial transactions, and we in turn take our responsibility to protect your confidential information and privacy seriously. We will never share or sell any nonpublic personal information about you to unaffiliated third parties except as discussed below. We will only disclose your nonpublic personal information, as indicated in this policy, if we have obtained your consent or we are required by law to disclose such information.

Notice of Your Financial Privacy Rights

We, our, and us, when used in this notice, refer to the Wayne Hummer Companies (WH):

- Wayne Hummer Investments (WHI), our Broker/Dealer affiliate.
- Wayne Hummer Asset Management Company (WHAMC), our Investment Advisor affiliate.
- Wayne Hummer Trust Company (WHTC), our Trust Management affiliate.

This is our privacy notice for our customers. When we use the words “you” and “your” we are referring to all customers of the Wayne Hummer Companies, past and present.

The Information We Collect

In order to provide you with individualized service, we collect personal information that enables us to evaluate your financial needs, to process your requests and transactions, to inform you about products and services that may be of interest to you, and to improve customer service. The information we collect about you includes:

- Information you provide to us on applications or other forms (such as your name, address, social security number, spouse and dependents, investment objectives, income, and net worth).
- Information about your transactions or experience with us and our affiliated companies (such as purchases, sales, wire instructions, and account balances).
- Information from a consumer-reporting agency.
- Information we receive as a result of verifying customer information.
- Information we receive as a result of your account inquiries by mail, e-mail, telephone, or web site usage (including any information captured through our use of “cookies”).

The Confidentiality, Security, and Integrity of Your Information

Keeping customer information secure and using it only as you would want us to is a top priority for all of us. We do not disclose any personal information about you to non-affiliated third parties, except as permitted by law.

Specifically, so that we may continue to effect transactions that you request or authorize and to offer you products and services that best meet your investing needs, we may disclose the information we collect, as described above, to companies that perform trade execution, and administrative or marketing services on our behalf, such as clearing firms, service bureaus,

transfer agents, or printers and mailers that assist us in the distribution of investor materials. These companies may only use this information for the services for which we hired them and are not permitted to use or share this information for any other purpose.

We may share the personal information we collect about you, as described above, with our affiliates*, such as financial institutions, as permitted by applicable law. In addition, Wayne Hummer Investments specifically enters into agreements with financial institutions to jointly market non-deposit investment products and services to customers. As joint marketers, the nonpublic personal information for our clients may be made available to both institutions. Beyond these joint-marketing arrangements, we will not disclose any of the above-mentioned non-public personal information about you to non-affiliated third parties, except as permitted by law.

If you close your account(s) or become an inactive customer, we will adhere to the privacy policies and practices as described in this notice.

With regard to our internal security procedures, we restrict access to personal information about you to those employees who need to know that information in order to service your account. We maintain physical, electronic, and procedural safeguards to protect your personal information. Your right to privacy extends to all forms of contact with us, including telephone, written correspondence, and electronic media, such as the Internet. Employees who violate our rules will be subject to our normal disciplinary process.

If you have questions about our policy or for additional copies of this notice, send an e-mail to privacy@whummer.com or contact the Wayne Hummer Companies at 222 South Riverside Plaza, 28th Floor, Chicago, IL 60606 or call 866-943-4732.

**An affiliate is a company we own or control, a company that owns or controls us, or a company that is owned or controlled by the same company that controls us. Ownership does not mean complete ownership, but means owning enough to have control.*

Wayne Hummer Companies Business Continuity Plan

Wayne Hummer Investments has developed a Business Continuity Plan on 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 by calling your Financial Advisor directly or 866-943-4732, you should call our alternative number 800-678-0833 or go to our web site at www.whummer.com. If you cannot access us through either of those means, you should contact our clearing firm, First Clearing LLC (FCC), at 1-800-727-0304 or

www.firstclearingllc.com for instructions on how it may provide prompt access to funds and securities, enter orders and process other trade-related, cash, and security transfer transactions for you.

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 communications with customers, employees, and regulators; alternate physical location of employees; critical supplier, contractor, bank and counter-party 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, FCC, 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 and payments within 24 to 48 hours. Your orders and requests for funds and securities could be delayed during this period.

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 site when needed and expect to recover and resume business within 24 hours. 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 within 24 hours. In either situation, we plan to continue business, transferring operations to our clearing firm if necessary, and notify you through our web site www.whummer.com or our customer emergency number, 800-678-0833. 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.

For more information – If you have questions about our business continuity plan, you can contact us at 866-943-4732.

Customer Complaints

Mail: Wayne Hummer Investments, Attn: Compliance,
222 South Riverside Plaza, 28th Floor,
Chicago, IL 60606

Phone: 800-621-4477 **Email:** whcompliance@whummer.com

Disclosure Statement

As clearing agent for Wayne Hummer Investments, FCC selects the execution venue on behalf of Wayne Hummer customers.

How FCC Determines Where to Route Customer Orders:

FCC routes customer orders for over-the-counter and listed equity securities to selected market makers for execution. FCC receives compensation in the form of a per share cash payment for directing order flow to these market makers. FCC considers a number of factors when determining where to send customers’ orders, including execution speed and price, price improvement opportunities, the availability of efficient and reliable order handling systems, the level of service provided, and the cost of executing orders. FCC regularly reviews transactions for quality execution.

All orders are executed at prices equal to or better than the displayed national bid/offer price, up to the displayed size, at the time of execution. The source and amount of any compensation received in connection with a transaction concerning order flow will, if appropriate, be disclosed upon written request.

At all times, FCC’s foremost concern is to obtain the best execution for clients, regardless of any compensation factor.

FCC Payment for Order Flow:

You acknowledge that you understand that the securities which are traded in your Account may be traded in more than one marketplace. Consistent with the overriding principle of best execution and subject to applicable regulatory requirements, you agree that we may use our discretion in selecting the market in which to enter your orders.

Service Fees

Accommodations Transfers	No charge for list registration. \$15.00 per each additional registration
Outgoing Account Transfers	\$75.00 per account
Wire Transfers	\$15.00 per wire
International Wire	\$35.00 per wire
Foreign Security Transaction	Variable
Returned Checks	\$25.00 per check
Stop Payment	\$15.00 per check
Stock Deposit Rejection	\$50.00
Direct Registration Rejection	\$75.00
Transaction Charge	\$5.00 per trade
<i>Service fees are subject to change without notice. This service fee schedule is not all-inclusive. There may be additional fees for other services requested. Please inquire. Effective June 2006.</i>	