

ASTOR INVESTMENT MANAGEMENT
FORM OF NOTICE REGARDING
THE INFORMATION SECURITY & PRIVACY POLICY

We collect nonpublic personal information about you from the following sources: (a) information we receive from you on applications or other forms; and (b) information about your transactions with us, our affiliates, or other parties. The types of information collected may include social security number, name, mailing address, and information about your financial condition, including your net worth. However, we do not disclose any nonpublic personal information about our clients or former clients to anyone, except as permitted by law. We restrict access to nonpublic personal information about you to those employees and/or affiliates who need to know that information to provide products or services to you. We may also contract with nonaffiliated parties to perform services for our firm or our clients. In these instances, we will only provide these parties with information about our clients that is necessary to carry out their responsibilities. We contractually require any such service providers to follow appropriate policies and procedures to maintain the security and confidentiality of such information. We may be required to disclose your nonpublic personal information in response to regulatory examination or subpoena. We maintain administrative, technical, and physical safeguards that comply with federal standards to guard your nonpublic personal information. Generally, such safeguards include procedures to ensure that all physical copies of nonpublic personal information are kept secure when unattended, as well as procedures to ensure that all electronic communications and information is secured by passwords when appropriate and is only made available to the appropriate individuals authorized to obtain access to such information.