

Privacy Policy Statement

October 1, 2005

Pursuant to Title V of the Gramm-Leach-Bliley Act and United States Securities and Exchange Commission Regulations S-P (17 CFR 248.1 – 243.30) this document sets forth the Privacy Policy of BestVest Investments, Ltd. (hereinafter referred to as BestVest) concerning the privacy interests of individual customers of financial services. BestVest is a Michigan corporation with its principal office in Media, PA. The phone number is 1-800-434-1176. BestVest is a member of the National Association of Securities Dealers.

BestVest acts as an introducing broker-dealer in accordance with all laws, rules and regulations applicable to an introducing broker-dealer. BestVest conducts a retail securities business with public customers and provides financial services, including the responsibilities associated with an introducing broker-dealer, to credit unions and banks.

In the course of ordinary business BestVest receives and/or comes into contact with non-public personal information concerning current and/or former customers. Any and all such non-public personal information related to customers will hereinafter be referred to as non-public personal information. BestVest receives and/or comes into contact with the non-public personal information only for the purpose of conducting business in accordance with the rules of the SEC and the NASD or other regulators of the securities industry and to provide informed services to customers. Hereinafter “you” and “your” refers to any and all customers described above.

BestVest does not sell your non-public personal information.

In conducting its business, BestVest collects (or may collect) for example the following types of information.

Information you provide in connection with any securities account, margin account, loan, debit card or any other financial product or service, whether in writing, by telephone, electronically or by any other means, includes your name, address, social security number, tax ID number, assets, income, investment objectives, marital status, employment history, relationship to any individual in the securities business, financial situation and debt. Other information BestVest obtains for the purpose of tax reporting to you and to the various agencies to which a broker-dealer, clearing house, mutual fund company, unit investment trust company or a private company reports as required by law, including disclosures on various Internal Revenue Service forms that we provide to a clearing house, a mutual fund company, unit investment trust company or a private company.

BestVest also collects information about your securities account. The information includes and relates to account balance, payment history, trading activity and any other transactions concerning your account which BestVest introduces to a clearing house, mutual fund company, unit investment trust company or a private company directly or indirectly. BestVest also collects information as part of servicing your account such as new address, phone number, fax number, e-mail address, alternate address and any other information.

Information may also be received from non-affiliated third parties pursuant to law, rules, regulations, standard securities industry practice and/or legal process, including information and/or documents received, shared, produced or provided in connection with a subpoena,

discovery, request or other legal process compelling production. Information may also come from non-affiliated third parties related to servicing your account for the purpose of providing investment services, financial planning services or discount brokerage services.

BestVest may also receive information from consumer reporting agencies. This information may include your creditworthiness or credit history or other information with regards to margin-lending or other financial transactions. Additional information from outside services may include employment history, credit information, liens, credit card balances, regulatory history, including civil and criminal records.

Non-public personal information disclosed to affiliates and non-affiliated third parties:

BestVest provides to a clearing house, a mutual fund company, unit investment trust company, bank, credit union or a private company only that information necessary to provide transaction services. Such disclosure includes information related to the transaction, settlement, billing, payment, processing, clearing, transferring, reconciling, collection and tax reporting. BestVest may provide such disclosures to affiliates and non-affiliated third parties as required or necessary to carry out fully and properly the securities business.

The information may be provided to various vendors who process and create monthly account statements, confirmations and 1099 statements as required by law or legal process, or with your consent.

BestVest does not sell non-public personal information of former customers.

Former customers:

BestVest will disclose non-public personal information about former customers *only* as permitted or required by law or legal process, or with your consent.

Confidentiality and security of non-public information:

BestVest maintains all information consistent with commercially reasonable methods. Appropriate measures are designed to keep your non-public personal information in a secure and confidential fashion.

Only authorized individuals have access to your account information.
Pre-employment screening, including fingerprinting for all employees.
BestVest is dependent on the clearing house to secure electronic storage of information.
Our clearing house has encrypted, where appropriate, customer non public personal information. They also have monitoring systems to detect actual or attempted attacks on or intrusions into their information database.

BestVest is reviewing its information programs to account for changes in technology.

BestVest reserves the right to change this Privacy Policy at any time.