

Client Information Privacy Principles

As an investment advisor registered under the 1940 Act with the Securities & Exchange Commission we are required to provide annually a copy of the Privacy Principles employed by Rowland & Company regarding your information.

We want to assure you that the safeguarding of client information is of the utmost importance to us and an issue which we take seriously. To affirm this commitment to the proper use of client information, we have set forth the following:

Recognition of Client's Expectation of Privacy: Rowland & Company believes the confidentiality and protection of our clients' information is one of our fundamental responsibilities. We recognize that one of our most important assets is our clients' trust. The safekeeping of your information is a priority.

Use, Collection and Retention of Information: Rowland & Company limits the use, collection and retention of client information to what we believe is necessary or useful in order to conduct our business, including interacting with third parties (such as a broker/custodian/dealer) who provide services to you via relationships with Rowland & Company.

Maintenance of Accurate Client Information: Rowland & Company recognizes the need to maintain and provide accurate records. We have established procedures to maintain the accuracy of our client information and to keep such information current and complete. This includes responding to requests for corrections to inaccuracies in a timely fashion.

Limiting Employee Access: At Rowland & Company, employee access to personally identifiable client information is limited to those with a business reason to know such information. Employees are educated on the importance of maintaining confidentiality of information and on these Privacy Principles. All employees or principals are responsible for maintaining the confidentiality of our clients and their information and anyone who violates the Privacy Principles will be subject to disciplinary measures.

Protection of Information via Established Security Procedures: Rowland & Company recognizes that a fundamental element of maintaining effective client privacy procedures is to provide reasonable protection against the unauthorized access to client information. We have established appropriate security standards and procedures to guard against any unauthorized access to client information.

Restrictions on Disclosures of Client Information: With regard to sharing client information with unaffiliated third parties, Rowland & Company will provide information only if requested to do so by

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a client; an example would be the release of information to a mortgage broker with which the client intends to do business. We *do not* prospectively share client information with third parties who may provide services we believe would be of value “across the board” to our clientele.

We will share the minimum amount of information legally required or permitted in connection with fraud investigations, litigation or similar matters.

Maintaining Client Privacy in Business Relationships with Third Parties: If we provide personally identifiable client information to a third party with which we have a business relationship, we will insist that the third party keep such information confidential consistent with the conduct of our business relationship.

Disclosure of Privacy Principles to Clients: Rowland & Company recognizes and respects the privacy expectations of our clients. We want you to understand our commitment to privacy in the use of client information, and have thus developed these principles which are made readily available to our clients. If you have questions regarding the privacy of client information, please call chief compliance officer, Charles R. Dickerson, Sr. at 1.888.469.5350 (toll free), 404.816.5350, or email dickerson@rowlandco.net

These Privacy Principles apply to individuals and we reserve the right to change them, and any of the policies or procedures described, at any time without prior notice. The Principles are for general guidance only and do not constitute a contract, create legal rights nor do they modify or amend any agreements we have with our clients.

December, 2013