



December 21, 2009

## Customer Information Privacy Principles 2010

RELIANCE Investing, Inc. (RELIANCE) collects personal and private information from you (its clients and group retirement program participants) in order to determine the client's specific investment goals and objectives which assist in determining how to adequately service you on the investment advisory services provided by RELIANCE as disclosed in RELIANCE's Form ADV Part II.

The safeguarding of your information is an issue we take seriously, and we want to assure all concerned that whenever information is collected and used, it is done so with discretion. To affirm our continuing commitment to the proper use of your information, we have set forth the following Privacy Principles, which are designed to guide us in serving your privacy needs.

**1. Recognition of and Your Expectation of Privacy:** we believe the confidentiality and protection of your information is one of our fundamental responsibilities. While collecting client personal information is critical to providing quality service, we recognize that one of our most important assets is our client's trust. Thus the safekeeping of your nonpublic personal information is a top priority.

**2. Use, Collection, and Retention of Customer Information:** RELIANCE limits the use, collection, and retention of customer information to what we believe is necessary or useful to conduct your business, provide quality service, and offer products, services, and other opportunities that may be of interest to you. Information collected may include, but is not limited to: name, address, telephone number, tax identification number, date of birth, driver's license or passport numbers, employment status, wills, trusts, mortgages, tax returns, retirement plans, annual income and net worth, spending habits, investment objectives, financial goals, and other records concerning your financial condition and assets.

**3. Maintenance of Accurate Information:** RELIANCE must maintain accurate customer records. The above referenced information is collected at the inception of your relationship with us. Thereafter, we may contact you periodically to review your overall account holdings, the services provided, and to ensure the personal/confidential information contained in your file is accurate. We also request that you review any information provided to you related to your advisory account, either by us or the account custodian, and notify us promptly on the discovery of erroneous information. We will respond to a comment/request to correct inaccurate information immediately. Where applicable, we will contact your custodian directly to provide instructions on updating the inaccurate information.

**4. Limiting Access to Information:** At RELiANCE, employee and independent contractor access to personally identifiable customer information is limited to those with a business reason to know such information. Employees and contractors are educated on the importance of maintaining the confidentiality of customer information and on these Privacy Principles. Because of the importance of these issues, all associates are responsible for maintaining the confidentiality of your information and associates who violate these Privacy Principles will be subject to removal from our organization.

**5. Protection of Information via Established Security Procedures:** RELiANCE recognizes that a fundamental element of maintaining effective customer privacy procedures is to provide reasonable protection against the unauthorized access to customer information. Therefore, RELiANCE has established appropriate security standards and procedures to guard any unauthorized access to customer information.

**6. Restrictions on the Disclosure of Customer Information:** Except as required or permitted by law, we do not share confidential information about you with nonaffiliated third parties. When it comes to sharing customer information with unaffiliated companies, RELiANCE places strict limits on who receives specific information about your accounts and other personally identifiable data. When necessary, we share the minimum amount of information required for that company to offer its product or service. We may also share information with unaffiliated companies that assist us in providing our products and services to you in the normal course of business, at your request or with your permission. Examples may include government agencies, when legally required or permitted in connection with fraud investigations and/or litigation, and in connection with acquisitions and sales.

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

**8. Disclosure of Privacy Principles to Customers:** RELiANCE recognizes and respects the privacy expectations of our clients. We want you to understand our commitment to privacy relative to our use of your information. As a result of our commitment, we have developed these Privacy Principles which are made readily available to any persons or entities that inquire. Clients who have questions about these Privacy Principles or have a question about the privacy of their customer information should contact Destry Witt, President and Chief Compliance Officer, at (888) 694-401K.

These Privacy Principles apply to individuals; we reserve the right to change these Privacy Principles and any of the policies herein.

Very sincerely,

Destry Witt  
President