

Protecting Your Privacy

Maintaining your privacy used to be easy, but modern business practices, technology, and communications, as well as new laws passed in the aftermath of terrorist attacks, have made the task more complicated. At Wulff, Hansen and Wulff Capital Management we respect your right to privacy and make it a priority. We want you to know how we use (and don't use) your personal information, so we are sending you this document to tell you about our policies and practices in this regard.

What information do we collect? In order to serve you we have to collect personal information about you. When you establish an advisory relationship or communicate with us, we may have your name, address, phone number, social security number, investment information and other personal data. If you became our client after the passage of the Patriot Act and other legislation, we explained that Federal law requires that we take measures to verify your identity and the identity of others who may be involved with your account. When you do business with us we keep records of your identity, your financial transactions, your accounts, and your relationship with us.

How do we use your information within our company? We use the information to help us help you with your investments. For example, we use your name and address to mail out reports, and we use your telephone number to contact you when necessary.

How do we share your information with other companies? We don't disclose your personal information to outsiders except in order to provide customer service and account maintenance, or where sharing it makes it possible for us, our staff, or other entities to comply with laws or regulations. This means that there is no sharing of your information in ways from which you might want or need to "opt out".

For example, we disclose your personal information to the broker/dealer Custodian carrying your account and to other companies that help us complete your transactions or provide services to you or to us on your behalf. Our policy is to give these companies only the information that they need to do the job. With your permission, we may also provide information or discuss your account with your accountant, your attorney, or with any other person when you've requested that we do so.

We also disclose your information where the need to do so arises out of law or regulation. Your information is available to securities regulators in the course of their duties and to third parties who for compliance reasons are required to review our business and monitor the activities of our staff. Such parties have their own systems for protecting your information while in their custody. Anti-moneylaundering requirements may result in a need to share information with other financial institutions or the government. Further, if we receive a subpoena or court order requiring disclosure of information about you, we would have to comply with it. In addition, the Custodian carrying your account has its own privacy policies and obligations. For example, the IRS requires that it report dividends, interest, sale proceeds, and other financial facts. You receive a copy of the broker's privacy policy every year, and you should read it to learn more about their policies.

You should also be aware that the USA Patriot Act and other federal laws and regulations, reflecting wide-ranging powers exercised by the government in an effort to control crime, money-laundering and terrorism, mean that all financial institutions are now obligated to report certain information regarding a broad range of transactions, asset movements, and other activity meeting government definitions of "suspicious", and that in such cases we are specifically forbidden to let you know that such a report has been filed about you. In order to comply with these laws and regulations, we may also share your information with other financial institutions in accordance with the provisions of Section 314(b) of the USA PATRIOT Act and 31 CFR 103.110. The reports are known as "SARs" (Suspicious Activity Reports). These laws also require that we respond to certain government inquiries about you personally or about your accounts and in such cases we are also prohibited from telling you that the government is checking on you. In addition, broker/dealers like the firm holding custody of your assets regularly receive lists of many names from the government, and are required to tell them whether anyone with that name has an account. This means that your account may be reported if your identity happens to be similar to that of someone they are inquiring about. There are no options in this regard; this is the law. If you have opinions about the balance between privacy, civil liberties, and national security, we urge you to write to your representatives in Washington expressing your views.

How do we protect your information? Access to your personal information in our offices and elsewhere is restricted and only available to those who have a need to see it. All of our employees are informed of the need to maintain confidentiality. Access restrictions include physical security in the case of paper records and electronic security in the case of computerized records. Any companies we hire to provide supporting services are not allowed to use your information for their own purposes and are obligated to maintain confidentiality.

Future Changes: We regularly evaluate our business practices and policies as well as various regulations that require us to keep your information up to date. If you give us new information, or find any inaccuracies in what we already have, the new or corrected information will also be handled in accordance with our privacy policies.

If in the future we should need to change these policies, we will give you advance notice of the change if it would mean that your information would be disclosed in discretionary ways that our present policies don't allow. You would be generally be given the opportunity to opt out of such disclosure. This does not apply to legally approved, compliance-mandated, or 'safe-harbor' disclosures such as the SARs described above.

If you have any questions about your information or our policies regarding it, please don't hesitate to ask. We will be happy to discuss these matters with you.

Emergency Preparedness

None of us likes to think about disaster, but you should know that we have plans for dealing with various contingencies that may arise, ranging from a fire, flood, or power outage in one of our offices up to a national disaster affecting the nation's economy and financial markets in a major way. Such scenarios are generally referred to as 'SBDs', an abbreviation for 'Significant Business Disruption'.

The events of September 11, 2001 and various subsequent natural disasters resulted in serious and prolonged disruption for many participants in our financial system. As a result, new regulations were put in place to help banks, broker/dealers, and others to plan for possible future disruptions of various types. These regulations also mandate that we tell you, in very general terms, what we plan to do.

Our primary goal in coping with any such event will be to provide you with information and help you with access to the funds and securities in your brokerage account, subject only to protecting the lives, health and safety of our staff and of other human beings. Naturally, there can be no assurance that this goal can be met, especially during the initial period following a disaster, but we intend to exert every effort to recover quickly and resume operations in a manner as close to normal as is reasonable under the circumstances. The time required for such recovery is dependent on many factors but in general will vary in proportion to the severity of the disruption. The broker/dealer carrying your account has its own business continuity plan, and you will receive information on it periodically.

Please also be assured that critical records concerning your account are duplicated in multiple locations by both us and the Custodian, including secure facilities outside California. All of us hope that these plans will never be needed. If they are, we intend to do everything we can to continue providing the services you need from us.

Type of SBD	Examples	Response
Branch	An SBD in a remote office location	Provide service from main office
Local	A major fire in our headquarters, an earthquake comparable to the Loma Prieta quake preventing access to the premises, or another event like a wildfire affecting only us or the immediate area.	Continue operations and provide service from specific pre-identified location(s) in the San Francisco region.
Regional	A larger earthquake or a major terrorist attack on the Bay Area.	Operate from specific pre-identified location(s) outside the Bay Area.
National	National financial or communications system seriously disrupted, by attack or otherwise.	Await measures taken nationally to restore the infrastructure necessary for financial system to operate, then resume business from all offices.
Telephones:	Main Office 415.421.8900	Lodi/Stockton 209.333.7700