



2010 Privacy Policy

Securities regulations require Sumner Harrington Ltd. to provide you with a copy of our privacy policy each year. At Sumner Harrington Ltd. we believe that our reputation is a direct reflection of the trust that we establish and maintain with our customers. One of our foremost concerns in establishing that trust is to protect the privacy of your personal information.

To protect your right to privacy, we have adopted standards and procedures that are designed to prevent the misuse of your personal information. These standards and procedures can be summarized as follows:

1. Your personal information is gathered for business purposes only.
2. By requesting information from us regarding an investment or by purchasing an investment through us, you are also agreeing to allow us to share your personal information with those employees and non-affiliated service providers that need to know this information in order to serve you.
3. Precluding us from sharing this information with employees and non-affiliated service providers will prevent us from servicing your account properly.
4. We cannot accept investments from persons who request that we not share their personal information with employees and non-affiliated service providers.
5. We never sell your personal information to an outside entity for any reason.

We take great care to safeguard your personal information and ensure its accuracy.

- Employees are educated about the importance of privacy in accordance with our current policy manual. Employees that do not adhere to our privacy policy risk disciplinary measures that may include immediate termination.
- We require non-affiliated service providers that have access to your personal information to abide by our privacy policy.
- We maintain physical, electronic and procedural safeguards to protect your nonpublic personal information that comply with all applicable regulatory standards. Customer files and statements are kept in secure areas. We destroy ancillary documents that we receive from you that do not directly pertain to your investment such as your mailing envelopes.
- We strive to maintain complete, current and accurate information about you and your investments. If you request a correction to our records, we will respond in a timely manner.
- Investment information, financial history and compliance reports are only available to designated personnel.

Why does Sumner Harrington Ltd. need my personal information and how is it collected?

As a regulated broker-dealer, we are required by law to make a reasonable effort to obtain certain information regarding the financial status, tax status and investment objectives of our investors. We use this information to determine the suitability of the investments you wish to purchase.

We initially collect this information when you complete an investor profile. Additionally, we require you to complete a subscription agreement each time you invest. We also require you to periodically update your investor profile.

What personal information does SHL need?

The personal information that we collect about you includes:

- Name, address, social security number, date of birth, citizenship, taxpayer identification number, occupation, and such financial information as deemed necessary.

Who has access to my personal information?

Access to your personal information is limited to only those employees and non-affiliated service providers that need to know this information in order to serve you. We may also share this information with others as required by law, including regulatory agencies, governmental agencies or auditors. We may also share this information in the event that we sell or merge parts of our business.

What non-affiliated third parties have access to my personal information?

To help us serve you, we may share some of your personal information with non-affiliated service providers that are contractually obligated to abide by our privacy policy and are restricted from using this information for any reason beyond the performance of specified services on our behalf. These non-affiliated service providers include companies that send principal and interest payments to your deposit account, send a Form 1099 INT to you each January, prepare account statements for us or help us market our products. We will not share your personal information with any other non-affiliated third parties except these service providers.

Can I request that SHL not share my personal information with non-affiliated service providers?

Yes. However, precluding us from sharing this information with non-affiliated service providers will prevent us from servicing your account properly. Therefore, we cannot accept investments from persons who request that we not share their personal information with non-affiliated service providers.

Who should I contact if I have further questions?

Please contact Sumner Harrington Ltd. by telephone at (800) 234-5777 or by email at investorservices@sumnerharrington.com.

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Business Continuation Plan Summary

Securities regulations require Sumner Harrington Ltd. to summarize for you on an annual basis our business continuation strategy in the event of a disaster.

Redundancy

The proprietary database that we use to manage the offerings we sell is internet-based and all critical information and systems are backed up off the premises.

As additional back up, each Issuer and the Trustee for each offering maintain copies of our customer records. Each Issuer also has access to our proprietary database via the internet.

Disaster Recovery

If our current facility was damaged or destroyed, we would move to another nearby location and continue to do business with minimal disruption.

In the event of a regional disaster that affected more than just our current location, we would relocate to another facility outside of our immediate geographic area and continue to do business.

In either case, you would be able to reach us or leave a message with us at our new location by simply calling our existing toll-free number.

Our web site and telephone system would be updated to tell you our new address and provide a time estimate for the resumption of our normal business.

Sumner Harrington's Demise

Each Issuer has access via the internet to the proprietary database that we use to manage the offerings. In the event of our demise, the Issuer and the Trustee would continue to service your account.

Our business continuation plan may change as conditions and events warrant. Copies of this summary are available on our web site at sumnerharrington.com and are also available upon written request.

FINRA Anti-Money Laundering Disclosure

Securities regulations requires us to disclose the following: To help the government fight the funding of terrorism and money laundering activities, federal law requires all financial institutions, including Sumner Harrington Ltd., to obtain, verify and record information that identifies each person who opens an account. When you first purchase an investment through us, we will ask you to provide your name, address, date of birth and other information that will allow us to identify you.

FINRA Contact Information

Sumner Harrington Ltd. is required to inform you on an annual basis how you can access information at FINRA (Financial Industry Regulatory Authority) about member firms and registered persons.

- You can access the FINRA web site at <http://www.finra.org>.
- You can obtain a FINRA *BrokerCheck* brochure at the following web site:

<http://www.finra.org/InvestorInformation/InvestorProtection/PuttingInvestorsFirst/index.htm>

- You can access the FINRA BrokerCheck telephone hotline by dialing (800) 289-9999.

If you have any questions, please contact

Sumner Harrington Ltd.

Member FINRA / SIPC

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