

# THE MECKENSTOCK GROUP INC.

## MAIN STREET ADVISORS, LLC

### NOTICE OF PRIVACY POLICIES

*Effective January 1, 2009*

Pursuant to Regulation S-P of the United States Securities and Exchange Commission, this Notice is provided to individuals who are clients of either The Meckenstock Group Inc. ("TMG"), an SEC-registered broker-dealer, or Main Street Advisors, LLC ("MSA"), an SEC-registered investment adviser. TMG and MSA are affiliated companies and are referred to jointly in this Notice as "TMG."

At TMG, we are committed to maintaining the confidentiality of your personal information. We have adopted privacy policies so that you will know what personal information we collect about you, how we treat it, with whom we share it, and how we protect it. Our privacy policies, as amended from time to time, apply to all current and former customers of TMG or MSA. We reserve the right to amend our privacy policies at any time, without prior notice, subject to compliance with applicable regulatory requirements.

#### **USA PATRIOT ACT AND YOUR PERSONAL INFORMATION**

To help the government fight the funding of terrorism and money laundering activities, Federal law requires all financial institutions to obtain, verify, and record information that identifies each person who opens an account. When you open an account, we will ask for your name, address, date of birth and other information that will allow us to identify you. We may also ask to see your driver's license or other identifying documents.

#### **INFORMATION WE COLLECT**

In the normal course of business, we collect personal information about you from a variety of sources, including:

- **Information from you**, such as information we receive from you on account applications or other forms (such as your name, address, social security number, marital status, employment, assets and income); or from personal contact with you.
- **Information about you and your transactions with us, our affiliates, or others**, including our clearing firm (RBC Correspondent Services), and custodians, brokers, mutual fund companies, insurance companies, or other product sponsors (such as your account balances, investments, deposits, and withdrawals); and
- **Information we receive from consumer reporting agencies** (such as information to verify your identity, your credit history, and creditworthiness).

#### **INFORMATION WE DISCLOSE AND TO WHOM WE DISCLOSE IT**

We do not sell customer lists and will not sell your name to telemarketers. We may disclose all of the information we collect, as described above, to companies that perform marketing services on our behalf or to other financial institutions with whom we have joint marketing agreements.

We may also disclose the nonpublic personal information that we collect about you to effect, administer, or enforce a transaction that you request or authorize, or in connection with: processing or servicing a financial product or service that you request or authorize; maintaining or servicing your account with us or with another entity; or certain transactions related to you or your account.

Further, we may disclose your personal information to the following types of individuals or firms who perform services for us, or as otherwise required or permitted by law under circumstances where we are not required to provide you an "opt-out" right:

- **Financial service providers**, such as our Representatives, our affiliates, our clearing firm (RBC Correspondent Services), and custodians, brokers, dealers, mutual fund companies, insurance companies, or other companies that provide, sponsor, issue, process, or maintain any security, account, or investment product, service or program for you or your benefit;
- **Non-financial companies**, such as third parties who provide customer service, consulting, technology, or other services for us (some of which may maintain on their premises electronic records containing your nonpublic personal information); and
- **Others**, such as attorneys, trustees, family members, or anyone else who is authorized to represent you, your estate, or any joint or co-owner of your account.

#### **DISCLOSURES BY OUR CURRENT AND FORMER REPRESENTATIVES**

Some Meckenstock Group Representatives own or work for independent investment advisory, insurance, or security businesses which are not affiliated with TMG (the "Independent Businesses"). We permit Meckenstock Group Representatives who service your account to use the nonpublic personal information about you in connection with their Independent Businesses.

Additionally, if a Meckenstock Group Representative leaves The Meckenstock Group and associates with a new broker-dealer, investment adviser, or other financial services firm, we will usually permit the Representative to retain copies of all or part (as we deem appropriate) of your nonpublic personal information. The Representative may disclose this information to his or her new firm, its affiliates, custodians, brokers, and clearing firms (collectively, the "Successor Institutions"), which they may use for their own purposes.

If you do not want us to share your information with any non-affiliated third parties, please contact our Compliance Department by calling our toll free number 1-800-752-2439. Please note that your election to opt out will not limit the disclosures we are permitted or required to make by law without your consent, and will not apply to information you disclose to an Independent Business or Successor Institution. In addition, there are some states that require clients to "Opt-In" before a broker-dealer or investment adviser may disclose information to non-affiliated third parties. If you live in one of these states, we will follow state requirements before sharing your information.

#### **OUR SECURITY POLICY**

We restrict access to nonpublic personal information about you to our employees, our Representatives, and the employees of the Independent Businesses, and to permitted third-parties who need to know that information to provide products or services for us, or to provide, issue, process, or maintain any security, account, or investment product, service or program for you or your benefit. We maintain physical, electronic, and

procedural safeguards that comply with Federal standards to guard your nonpublic personal information while in our possession or control.

**QUESTIONS REGARDING OUR POLICIES**

If you have any questions concerning this Notice or our privacy policies, please contact us at 1-800-752-2439 or write us at:

The Meckenstock Group, Attn: Compliance  
1407 Main Street, Hays, KS 67601