

March 4, 2020

Re: PRIVACY & CONFIDENTIALITY POLICY NOTICE PURSUANT TO SEC REG. S-P

Dear Client:

At Investment Partners we believe that privacy is important to every client, and protecting that privacy is a responsibility we take very seriously. For this reason, we would like to take this opportunity to explain to you that as a client of our firm you can feel confident that we are committed to safeguarding your personal information. The following is a description of our Privacy Policy regarding our practices with respect to the use, retention, and security of information about you.

To establish and maintain your account, our firm has collected information including, but not limited to, your name, address, social security number (or tax id number), assets, income, investment experience, and objectives. Other than as further indicated in this notification, we do not disclose information about present or former clients to anyone other than to effect transactions, service your account, maintain files for your account at our brokers' clearing agent(s) or other outside custodians or managers where the assets in your account reside (or are managed or sub-advised), or as required by law.

We will continue to receive non-public information regarding your account such as holdings, transactions and market value. To properly service your account, we gather and keep your non-public information only to the extent that we must. Additionally, if your account is advised or managed by us at Investment Partners Asset Management, Inc, or at TR Winston & Company LLC, we may provide historical information regarding your account, including non-public information, on a strictly confidential basis to firms specialized in financial data management who assist us in calculating performance, generating reports used to analyze your account(s) and financial condition, and storing large quantities of data. We have established security standards to ensure against unauthorized access to your information.

Our employees are trained regarding our privacy policy. They have access to your information on a need-to-know basis only and, except as indicated above, are not permitted to release your financial information to any non-affiliated third-party. If you have any questions regarding our Privacy Policy please call us at 732-205-0391.

Sincerely,

Investment Partners Asset Management