

**D.F. DENT AND CO., INC.**  
**PRIVACY POLICY**

Employees of D. F. Dent and Company may not disclose any non-public personal information (name, address, social security number, assets, income, information regarding your transactions with us, beneficiaries, etc.) of prospective, current or former clients to any non-affiliated third party (this would include but not be limited to: family members, marketing firms, insurance companies, non-custodial banks, etc.)

D. F. Dent and Company has instituted physical, electronic, and procedural safeguards to protect client non-public personal information.

*Physical* – Building has a sign-in procedure for visitors. Main entrance to office requires use of a fob. The side door to the office has a coded entry system. The stairwell is not accessible from the ground floor. Office is never left unattended during office hours. During non-office hours, the office is accessible only with the use of a programmed fob or the side door code.

*Electronic* – There is a firewall connected to our internet provider and the D. F. Dent and Company server, as well as anti-virus software on each workstation.

*Procedural* – The standard procedure at D. F. Dent and Company is to deny information to anyone requesting it until such time as the client can be contacted to verify that release of this information is permissible. This includes verbal, written and facsimile requests.

D. F. Dent and Company may share personal non-public information about our clients with broker-dealers, transfer agent affiliates, non-affiliated financial institutions that provide processing, account maintenance and related services to the extent permitted by law.

D. F. Dent and Company may share personal non-public information about our clients as required by regulatory authorities or law enforcement officials who have jurisdiction over D. F. Dent and Company, or as otherwise required by any applicable law.

D. F. Dent and Company may share personal non-public information about our clients to the extent reasonably necessary to prevent fraud and unauthorized transactions.

D. F. Dent and Company may share names and addresses of our clients with a third-party firm only for D. F. Dent and Company product mailings (i.e., provide names and addresses of the firm's clients to a distribution company in order to send information concerning the firm's products such as our mutual fund).

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Employee Signature

Date