

To: All CPI Capital Clients
From: Jay O'Connell - Chief Compliance Officer
Re: Annual CPI Capital Consumer Privacy Notice
Date: December 15, 2007



CPI Capital (CPI) is the Broker/Dealer for the following financial service professionals:

- **CPI Advisors**
- **CPI Companies**
- **RSI Financial Services**
- **Greentree Investment Group**
- **Romano & Buonadonna Financial Services**

You are receiving this letter because your name and address is in our database of clients. Many of our clients don't immediately recognize our name and are related to CPI through a retirement account (such as a 403(b), Simple IRA or similar account through their employer sponsored retirement plan). CPI sends this notice on behalf of the advisors listed above. Feel free to call me with any questions or concerns.

Sincerely, **Jay O'Connell, CCO**

Privacy Policy and Notice of Privacy Practices

Protecting Your Information

CPI recognizes that your personal information is yours, not ours. We are committed to protecting your privacy and our policies and practices are designed to do just that. **We never rent or sell your personal information to anyone.** There is nothing to "opt-out" from.

Technology and Information

The insurance and financial services industries are rapidly being shaped by technology that is changing the way we do business. To be successful we must continue to ensure that our customers are confident in our ability to manage their affairs in a manner that protects each individual's right to privacy.

CPI Capital customers have access to a broad range of products and services, from basic investments and insurance to retirement accounts. To deliver these products and services as effectively and conveniently as possible, it is essential that we use technology to manage and maintain certain information.

Information We Collect About You

We collect personal, financial and health related information that is necessary for the opening accounts, processing of claims, for underwriting or applying for insurance, for securing investments, fulfilling legal and regulatory requirements, and for assisting clients with

policy or administration questions. The type of information we collect and maintain varies according to the products or services we provide for you or your employer.

We maintain pertinent personal identifying data (such as birth date and Social Security Number) as well as financial information and historical information on policies, plans or investments. We also maintain records on any health conditions disclosed or provided to us in the process of securing group or individual insurance; while assisting on an insurance policy question; or by an insurance company or health provider's office.

Health or medical information is only collected at your request for application to a life or health insurance company (and not collected without your knowledge and written authorization, which is HIPAA compliant).

Information About You that We May Disclose

When it comes to sharing customer information with unaffiliated companies, CPI places strict limits on who receives specific information about customer accounts, other personally identifiable financial data, and protected health information.

CPI may share information with such companies if they provide a product or service that may benefit our clients or that our client has

requested. We will only share such information in the course of fulfilling a business obligation. Whenever we do this we carefully review the company and the product or service to make sure that it provides value to our customers.

We may also share information with Regulators or Government Agencies when legally compelled, or in connection with fraud or Anti-Money Laundering investigations.

We do not disclose nonpublic information about our customers or former customers to any third party non-affiliated entity, except as permitted or required by law.

Protection of Shared Information

CPI recognizes that a fundamental element of maintaining effective customer privacy procedures is to provide reasonable protection against unauthorized access to customer information and protected health information.

Therefore, we have established appropriate security standards and procedures to guard against any unauthorized access to customer information. If we provide personally identifiable customer information or protected health information to a third party with which we have a business relationship, we will insist that the third party keep such information confidential, consistent with the conduct of our business relationship.

Electronic Mail

CPI uses electronic mail to (for example):

- Communicate with your Human Resources department or Plan Administrator.
- Send you requested information.
- Conduct underwriting, and application correspondence with insurance carriers and/or affiliates.

We never use e-mail for solicitation or advertising. CPI never sells or otherwise makes

available your e-mail address to anyone except as may be necessary to provide our products and services to our customers.

Protecting Your Personal Information

We want to assure all of our clients that whenever personal information is used, it is done with discretion. Safeguarding our clients' personal information is a very high priority. We maintain physical, electronic and procedural safeguards that protect your information. The following policies guide us in protecting our customers' privacy:

- At CPI, we believe the confidentiality and protection of customer information is one of our fundamental responsibilities. While information is critical to providing quality service, we recognize that one of our most important assets is our customers' trust.
- CPI limits the use, collection and retention of customer information to what we believe is necessary or useful to conduct our business, provide high-quality service, and offer products and services.
- At CPI, employee access to personally identifiable customer information and protected health information is limited to those with a business reason to know such information.

Employees are educated on the importance of maintaining the confidentiality of customer information. Because of the importance of these issues, all CPI employees are responsible for maintaining the confidentiality of customer information. Employees who violate these policies are subject to disciplinary or legal action.

Again, we at CPI Capital take your information privacy seriously. We will not sell your information. We will only use your information to provide you with the best possible service.

**CPI Capital
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Securities offered through CPI Capital, Member: FINRA / SIPC