Polar Investment Counsel, Inc.

Brokers and Investment Advisors; Member NASD, NFA, SIPC, MSRB Website: www.polarinvest1.com

Non-Clearing Firm Account Privacy Policy Notification

At least annually, all clients must receive notification of our Privacy Policy. For those clients who have a SWS securities account, this information is included on the monthly client statement every month, advising that they can view our CIB, which includes the Privacy Policy, on our website and therefore, a separate notice is not needed.

For clients who do not have a SWS securities account, (these are NCFA's) we must notify them by separate communication. We have created letter that must be mailed to each NCFA client. The letter titled, "NCFA Privacy Policy" can be found on the Forms & Documents page, Compliance Forms section. This document is designed to allow you to enter your personal information (name, address, etc.). You would print this after entering the information and copy it for mailing to your clients.

Below is the information that you need to insert in the document. To find the input area, hover your cursor over the area until the arrow turns into a bar and then click in that area and enter the following:

Upper left corner above "Registered Representative" type your name as you use it for business purposes. Below that and to the right of "Email:" type your polarinvest1.com email address. Directly below that, enter the current date.

Bottom left above "Registered Representative" type your name as you use it for business purposes. Directly below that type your address, city-state-zip and then your phone number.

Print the document and send to your NCFA clients.

Remember to evidence the mailing of the Privacy Policy notice on your Client Documentation blotter.