

## **Privacy Policy for U.S. Clients**

*Updated December 11, 2009*

City of London Investment Management Company Limited ("CoL") is committed to protecting clients' privacy and maintaining the confidentiality and security of client information. This Privacy Policy will help you understand how we safeguard the personal information we collect and how we use it to service your account.

### **Our Disclosure Policies**

CoL does not disclose client information to anyone, except as permitted by law and as is deemed necessary by CoL to provide our services to your account. This may include sharing information with non-affiliated companies that perform support services for your account or process your transactions with us. In addition, we may provide information to governmental or other entities to comply with applicable laws and regulations. Finally, we will release information if you direct us to do so.

### **Confidentiality and Security**

We have always considered the protection of sensitive information to be a sound business practice and a foundation of client trust. We protect the information by maintaining physical, electronic and procedural safeguards that meet or exceed applicable legal requirements. In addition, we restrict access to information to those employees and contractors who provide necessary services for your account.

### **Ongoing Commitments**

For former clients, CoL will treat information just as we treat the information of our current clients. CoL will continue to keep you informed of its privacy policies by providing you with a Privacy Notice annually. In addition, if any substantial changes occur in the way we collect, use or disseminate client information, we will notify you in advance and give you an opportunity to opt out of the changes as required by law.

Please contact CoL if you have any questions about this Privacy Notice or if you would like to discuss it in greater detail.