

PRIVACY POLICY-CAROLINA INVESTMENT ADVISORS

Carolina Investment Advisors [CIA] , as your Registered Investment Advisor [RIA], relies on access to your personal financial information so that we can make appropriate recommendations to you regarding the products and services offered through us.

CIA is committed to safeguarding your personal information provided to us by you. This notice, required under SEC regulation S-P, the Gramm-Leach-Bliley Act and by the Securities Division of the Department of the Secretary of State of North Carolina, describes our privacy policy and how we handle and protect your personal information. The provisions of this notice apply to all current and former clients of CIA.

WHY AND HOW WE COLLECT PERSONAL INFORMATION

As stated above, we collect personal information about you so that we may make recommendations about products and services we offer that may be of interest to you. We collect nonpublic personal information from the following sources:

- Information you provide to CIA on applications and other forms [such as your name, address, occupation, assets and income];
- Information about your transactions with CIA, our affiliates, or others and/or;
- Information we receive from consumer reporting agencies [such as your credit history and creditworthiness] and other entities not affiliated with CIA.

HOW WE PROTECT YOUR PERSONAL INFORMATION

We restrict access to your personal information to those employees who need to know this information to provide products and services to you. Our employees are required to maintain and protect the confidentiality of your personal information and must follow established procedures to do so. To comply with applicable laws and regulations, we maintain physical, electronic and procedural safeguards to comply with applicable laws and regulations to protect your personal information.

SHARING INFORMATION WITH OUR AFFILIATES & NON-AFFILIATED THIRD PARTIES

We may share your personal information described above with our affiliates and or our non-affiliate third parties for business purposes such as marketing new products and services, servicing your account, and as permitted by law. Our affiliates and non-affiliate third parties are companies controlled or under common control of our broker-dealer, American Portfolios Financial Services, Inc. [APFS]. **APFS, Inc. is a non-affiliated third party.**

DISCLOSURE TO NONAFFILIATED THIRD PARTIES

In the normal course of business, personal information may be shared with persons or entities involved in servicing and administering products and services on our behalf including:

- Financial service institutions such as mutual fund companies, securities brokers, insurance agencies, clearing brokers and banks, with whom we and/or APFS, Inc. have joint marketing agreements

- Companies under contract to perform services for us/APFS, Inc. on our behalf such as providing data processing, computer software maintenance and development, transaction processing and marketing services.

We may also disclose personal information with non-affiliated companies and regulatory authorities permitted by applicable law. For example, we may disclose personal information to cooperate with regulatory authorities and law enforcement agencies and as necessary to protect our rights and property. Except as described in this privacy policy, we will not use your personal information for other purposes unless we describe how such information will be used at the time you disclose it to us or we obtain your permission to do so.

QUESTIONS YOU MAY HAVE REGARDING THIS NOTICE

Please direct any questions you have to either Thomas F. Bare, II, President & CEO of CIA, or to the Compliance Department of APFS, Inc. at 1950 West Catawba Avenue, Suite 212, Cornelius, NC 28031 [704.439.2370], attention Ms. Elizabeth Munday.