
PRIVACY NOTICE

RICHARD BERNSTEIN ADVISORS LLC

Notice of Privacy Policy & Practices

This notice is provided by Richard Bernstein Advisors ("RBA"). We recognize and respect the privacy expectations of our customers.¹ We provide this notice to you so that you will know what kinds of information we collect about our customers and the circumstances in which that information may be disclosed to third parties who are not affiliated with us. If you are a corporate customer (including, for these purposes, legal arrangements such as trusts or limited partnerships) that provides us with personal information on individuals connected to you for any reason in relation to your investment with us, this will be relevant for those individuals and you should transmit this document to such individuals or otherwise advise them of its content.

Collection of Customer Information

We collect the following nonpublic personal information about our customers:

- Information from the customer;
- Information about the customer's transactions with us or our affiliates; and
- Information about the customer's transactions with non-affiliated third parties.

Information from these sources can include:

- Account Applications and other forms, which may include a customer's name, address, social security number, and information about a customer's investment goals and risk tolerance;
- Account History, including information about the transactions and balances in a customer's account; and
- Correspondence, written, telephonic or electronic, between a customer and RBA or service providers to RBA.

Among other sources, we may collect this information through Internet web sites.

¹ For purposes of this notice, the terms "customer" or "customers" include both (i) individuals who have a continuing client relationship with the firm (e.g., by having an advisory contract with the firm or by holding an investment product through the firm) and (ii) individuals who provide nonpublic personal information to the firm, but who do not have a continuing relationship with the firm (e.g., an individual who provides such information in deciding whether to become a client, whether or not the individual establishes a continuing relationship with the firm).

Disclosure of Customer Information

We may disclose all of the information described above to certain third parties who are not affiliated with us under one or more of the following circumstances:

- As Authorized – if you request or authorize disclosure of the information.
- As Required by Law – for example, to cooperate with regulators or law enforcement authorities.
- As Otherwise Permitted by Law – to organizations with which we are not affiliated, if doing so is necessary to provide the service the customer is buying (“Service Providers”) – for example, sharing information with companies that maintain, process or service customer accounts or financial products and services or effect, administer or enforce customer transactions is permitted. Among other activities, we may share information with broker-dealers in order to execute customer trades or with custodians that hold securities on behalf of customers. We may also share your personal information with organizations who provide services to our funds, including lawyers, auditors, accountants, brokers, AML service providers, tax information exchange service providers, or other back office service providers. We believe that sharing of information for these purposes is essential to providing customers with necessary or useful services with respect to their accounts.
- Under Joint Agreements – we may also share information with companies that perform marketing services on our behalf or to other financial institutions with whom we have joint marketing agreements and where such third party is required to maintain the confidentiality of such information.

Security of Customer Information

We require our Service Providers:

- to maintain policies and procedures designed to assure only appropriate access to information about our customers;
- to limit the use of information about our customers to the purposes for which the information was disclosed, or as otherwise permitted by law; and
- to maintain physical, electronic and procedural safeguards that comply with federal standards to guard non-public personal information about our customers.

We will adhere to the policies and practices described in this notice regardless of whether you are a current or former client of RBA.

Opting Out

Before we may disclose non-public personal information about any consumer (including any customer) to a non-affiliated third party other than a Service Provider and other than

pursuant to one of the exceptions under Regulation S-P, we must provide each consumer an initial privacy policy notice and an opt-out notice. The opt-out notice would describe our planned disclosures and give customers a reasonable opportunity to decline permission to make those disclosures.

Because we do not disclose non-public personal information to non-affiliated third parties, other than Service Providers or pursuant to the exceptions, we are not required to provide opt out notices.

Information Security

Within RBA, access to information about you is restricted to those employees who need to know the information to service your account. Our employees are trained to follow our procedures to protect your privacy and are instructed to access information about you only when they have a business reason to obtain it. We use physical, electronic and procedural safeguards to keep your information secure.

California Consumer Rights

Under California law, residents of California have the right to know what personal data is being collected about them, know whether their personal data is being sold or disclosed, opt out of the sale of their personal data, access their personal data, request deletion of their personal data, and have equal service and price even if they exercise their privacy rights. To exercise those rights, the California resident should call (212) 692-4000.

Changes to Our Privacy Policy

We reserve the right to change our privacy policy in the future, but we will not disclose your non-public personal information except to our affiliates and as otherwise required or permitted by law without giving you an opportunity to instruct us not to.

* * * * *

Questions?

If you have questions regarding these policies, please contact us by writing to Richard Bernstein Advisors, 120 West 45th Street, 36th Floor, New York, New York 10036, Attention: Michael Meyer, Chief Compliance Officer, or by calling (212) 692-4000. Your privacy is very important to us. This Privacy Notice sets forth our policies with respect to non-public personal information about our investors and clients and prospective and former investors and clients. These policies apply to investors in our funds and other clients and may be changed at any time, provided a notice of such change is given to you.