NOVEMBER 18, 2011

Northern Capital Management, Inc.
& W.F.C.G. Securities, Inc.

Privacy Policy

At Northern Capital Management, Inc. and W.F.C.G. Securities, Inc. the most important asset is our relationship with you. We are honored that you trust us with your financial affairs and we are committed to safeguarding the information we maintain about you. Establishing and adhering to an effective privacy policy is an important part of our commitment.

We collect information about you in a number of ways. The information we collect allows us to administer your account, provide services and better understand your financial needs. It has been our long-standing policy that disclosure of nonpublic personal information about our clients, including the very existence of our association, is prohibited.

What We Collect

The information we collect comes from various sources.

We collect data when you open an account, enroll in a service or participate in a promotion. This data may include your name, address, phone number, email address, Social Security number and date of birth. Once you open an account, we collect information such as the account number, balances, positions, account activity and transaction history. We may confer with consumer reporting agencies and information services to verify your identity, employment or creditworthiness.

During the course of business, we also collect personal details about you such as your interests, occupation, income level, investment experience, tax status, estate planning and other details about your household. If you choose to visit our website, we may follow your browsing history to track commonly used web pages and try to enhance your web experiences in the future.

What We Share

When you sign a Financial Advisory Agreement with another person or entity, you authorize us to release information about you and your accounts to the co-signer. The arrangement is explained in the Joint Clause section of the Financial Advisory Agreement. You can opt out of the clause when you sign the agreement or amend your choice later by submitting a request in writing. All jointly owned investment accounts must allow information sharing between the owners listed on the registration. Examples include Community Property, Joint Tenant accounts, etc.

Northern Capital Management, Inc. and W.F.C.G. Securities, Inc. are two separate companies with different business models. However, both companies are incorporated and run by CEO James K. Wilson and operated by the same employees. Many clients do business with one or both of these companies and, to create an efficient and comprehensive financial relationship to meet client needs, information is shared freely between NCM, Inc. and W.F.C.G. Securities, Inc.

With regard to other third parties, we do not disclose any nonpublic personal information about you unless one of the following exceptions applies:

1. Information sharing furthers our business relationship with you and sharing information is needed to effect transactions on your behalf or provide services you authorize. Examples include sharing information with broker-dealers, custodians, independent managers, website providers, account rebalancing software and vendors that provide reports or statements.
2. The third party performs administrative, audit or marketing services on our behalf. Companies we use to provide these services are limited in the use of information to the specific services we request. They are not allowed to share or use information for their own purposes. They are also contractually obligated to keep data secure. Examples include Client Relationship Management software, client surveys, third parties that provide audit testing of our systems or compliance procedures.
3. Information sharing is allowed with government agencies and persons assessing our compliance with industry standards. Examples include law enforcement, the Securities and Exchange Commission, FINRA, and other professional licensing authorities.
4. Information sharing is allowed with our attorneys, accountants and auditors.
5. Information sharing is allowed as required by law.

Your privacy is not for sale and we will not sell your personal information to anyone, for any reason, at any time.

We will comply with federal or state laws applicable to the disclosure or use of information about our clients.

How We Safeguard Your Information

We maintain physical, electronic and procedural safeguards that comply with federal standards. These measures include computer safeguards, secured files and secured buildings. We take precautions to ensure the information we collect about you is protected and accessed only by authorized individuals who are trained regarding our privacy and information safeguarding practices. Employees and agents with access to your data are required to maintain strict confidentiality.

Security Is a Partnership

As part of our commitment to identity theft prevention we will never request your account number, login password or Social Security number in an unsolicited telephone call or email communication.

Identity theft is a serious concern to all of us. We take steps to protect your identity by:

- Utilizing client identification and authentication procedures before initiating transactions.
- Creating a secure transmission connection to our website.
- Ensuring employees are trained to safeguard your personal information.

Changes to Our Privacy Policy

We will provide you with advance notice of material changes to our information-sharing practices.

Changes in Our Relationship with You

If you are a potential client, we adhere to this privacy policy as soon as we receive information about you. For new clients, we begin sharing information as described above when you sign the Financial Advisory Agreement. If you choose to terminate our services, we continue to adhere to our privacy policy, as amended over time.

To Limit Sharing

Please note information sharing on our part is limited to our ability to effectively do business. Further restrictions by you are limited. However, we want to highlight federal law gives you the right to limit information sharing as follows:

- Our sharing information about your creditworthiness with affiliates.
- The use of your information by affiliates or nonaffiliates to market to you.

Contact Us

To review your privacy preferences, provide us with updated information, opt out of client surveys, report suspected fraud or identity theft or to address other questions or concerns, please don't hesitate to contact our office.

We can be reached by:

- Telephone: (509) 456-2526 or (800) 826-9803
- Email: ncm@ncm-inc.com
- Regular Mail: 2700 S. Southeast Blvd. Suite. 205, Spokane WA 99223