

HOLT CAPITAL PARTNERS, L.P.

PRIVACY POLICY

To Our Clients and Investors:

We take precautions to maintain the privacy of personal information concerning our current and prospective clients and investors. These precautions include the adoption of certain procedures designed to maintain and secure your nonpublic personal information from inappropriate disclosure to third parties.

What kind of personal information do we have about you and where did we get it?

We collect nonpublic personal information about you from the following sources:

- Information we may receive from you in brokerage account applications; subscription forms or other related documents or forms;
- Information about your transactions with us, our affiliates, or others; and
- Information we receive from a consumer reporting agency.

How do we protect your personal information?

We do not disclose any nonpublic personal information about our clients or investors or former clients or investors to anyone, except as permitted by law.

We restrict to nonpublic personal information about you to those employees and agents of Holt Capital Partners, L.P. who need to know that information in order to provide our services to you. We may also disclose such information to service providers and financial institutions. We require such third party service providers and financial institutions to protect the confidentiality of your nonpublic personal information and to use the information only for purposes for which it is disclosed to them. We maintain physical, electronic, and procedural safeguards to protect your nonpublic personal information and which we believe are adequate to prevent unauthorized disclosure of such information.

If you have any questions concerning our privacy policies, please contact me.

Robert M. Holt, Jr. CFA