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registered investment advisers

January 2011

Re: Regulation S-P SEC Privacy Rule

Dear Client:

Strategic Capital Advisers, Inc. (SCA) is required by the Securities and Exchange Commission (SEC) to disclose its privacy policy to all clients on an annual basis. The policy relates to nonpublic personal information. It is SCA's practice to deal with nonpublic personal information using the following guidelines:

Strategic Capital Advisers, Inc. will not disclose any nonpublic personal information to any affiliates or nonaffiliated parties regarding any client without the consent of the client. This includes any former clients.

However, the following limited exception may apply:

When SCA retains a company to provide support services, SCA requires that company to sign an undertaking to maintain strict confidentiality when working with personal information.

SCA protects and safeguards the confidentiality, security and integrity of nonpublic personal information through the use of technology and a secured work environment.

As required by SEC regulations, you will receive a copy of this policy annually or if there are any changes in the policy.

Sincerely,

A handwritten signature in black ink, appearing to read "John Hancock", written in a cursive style.

John H. Hancock