

MONETTA FINANCIAL SERVICES, INC.
PRIVACY POLICY

Overview

As a registered investment adviser, Monetta Financial Services, Inc. (“MFSI”) must comply with SEC Regulation S-P (and any other applicable regulations), which requires registered investment advisers (i) to adopt policies and procedures to protect the “nonpublic personal information” of natural person consumers and customers (referred to herein collectively as “clients”) and (ii) to disclose to clients their policies and procedures for protecting that information. Nonpublic personal information includes nonpublic “personally identifiable financial information” plus any list, description or grouping of customers that is derived from nonpublic personally identifiable financial information. Such information may include personal financial and account information, information relating to services performed for or transactions entered into on behalf of clients, advice provided by MFSI to clients, and data or analyses derived from such nonpublic personal information (collectively, “client information”). Except as set forth below, MFSI may not share any of the client information that it collects.

Background

The purpose of this privacy policy and related procedures is to provide administrative, technical and physical safeguards which assist employees in maintaining the confidentiality of client information collected from MFSI’s clients. All client information, whether relating to MFSI’s current or former clients, is subject to this privacy policy and related procedures. Any doubts about the confidentiality of client information must be resolved in favor of confidentiality.

Responsibility

MFSI’s Chief Compliance Officer (the “CCO”) is responsible for reviewing, maintaining and enforcing this policy and related procedures to ensure meeting MFSI’s client privacy goals and objectives while at a minimum ensuring compliance with applicable federal and state laws and regulations. The CCO may recommend to MFSI’s President any disciplinary or other action as appropriate. The CCO is also responsible for distributing this policy and related procedures to employees and conducting appropriate employee training to ensure employee adherence to this policy and related procedures.

Procedures

This policy includes various procedures adopted by MFSI to implement this policy and to monitor and ensure that this policy is observed, implemented properly and amended or updated, as appropriate, including the following:

Disclosure of Client Information

MFSI maintains safeguards that comply with federal and state standards to protect the security of client information. MFSI does not share any client information with any affiliate or nonaffiliated third parties, except as permitted by law, such as in the following circumstances:

- With the consent or at the direction of the client;

- As necessary to provide the service that the client has requested or authorized, or to maintain and service the client's account;
- As required by regulatory authorities or law enforcement officials who have jurisdiction over MFSI, or as otherwise required by any applicable law; and
- To the extent reasonably necessary to prevent fraud and unauthorized transactions.

Employees are prohibited, either during or after termination of their employment, from disclosing client information to any person or entity outside MFSI, including family members, except under the circumstances described above. An employee is permitted to disclose client information only to such other employees who need to have access to such information to deliver our services to the client.

Security of Client Information

MFSI restricts access to client information to those employees who need to know such information to provide services to MFSI's clients.

Any employee who is authorized to have access to client information is required to keep such information in a secure compartment or receptacle on a daily basis as of the close of business each day. All electronic or computer files containing client information shall be password secured and firewall protected from access by unauthorized persons. Any conversations involving client information, if appropriate at all, must be conducted by employees in private, and care must be taken to avoid any unauthorized persons overhearing or intercepting such conversations.

Privacy Notices

MFSI will provide each client with an initial notice of MFSI's current policy when the client relationship is established. MFSI shall also provide each such client with the notice of the firm's current privacy policy at least annually. If, at any time, MFSI adopts material changes to this privacy policy, MFSI shall provide each such client with a revised notice reflecting the new privacy policy. The CCO is responsible for ensuring that required notices are distributed to MFSI's clients. The current notice of MFSI's privacy policy is attached hereto.

MONETTA FINANCIAL SERVICES, INC.
PRIVACY POLICY NOTICE

In order to provide the products and services of the Funds, we may collect nonpublic, personal information from you. We consider such information to be private and confidential and are committed to respecting your privacy and protecting your information.

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

- Information that you provide us on applications and other forms;
- Information that we generate to service your account, such as account statements; and
- Information that we may receive from third parties.

We do not disclose nonpublic, personal information about you without your authorization, except as permitted by law or in response to inquiries from governmental authorities. We may share information with affiliated and unaffiliated third parties with whom we have contracts for servicing the Funds, including transfer agents and mailing services. We will provide unaffiliated third parties with only the information necessary to carry out their assigned responsibilities and require third parties to treat your non-public personal information with the same high degree of confidentiality.

We restrict access to your nonpublic, personal information to those employees who need to know such information to provide products or services to you. We maintain certain physical, electronic and procedural safeguards that are designed to protect your nonpublic, personal information.

In the event that you hold shares of the Funds through a financial intermediary, including, but not limited to, a broker-dealer, bank, or trust company, the privacy policy of your financial intermediary would govern how your non-public personal information would be shared with non-affiliated third parties.