



## Privacy Policy of Just Plans Etc. 2017

To our Clients:

[No changes since 2007]

Your privacy is important to us, and maintaining your trust and confidence is one of our highest priorities. We respect your right to keep your personal information confidential and understand your desire to avoid unwanted solicitations. The following privacy policy serves as a standard for all Just Plans Etc. employees for collection, use, retention and security of nonpublic personal information. We hope that by taking a few moments to read it, you will have a better understanding of what we do with the information you provide us and how we keep it private and secure.

### A. Types of Information We Collect

We collect certain personal information about you-but only when that information is provided by you or is obtained by us with your authorization. We use that information to open your investment accounts and may also use it to provide retirement planning reports for you at your request.

Examples of sources from which we collect information include:

- interviews and phone calls with you,
- letters or e-mails from you,
- tax return or financial planning organizers, and
- financial history questionnaires.

### B. Parties to Whom We Disclose Information

As a general rule, we do **not** disclose personal information about our clients or former clients to anyone. However, to the extent permitted by law and any applicable Code of Professional Conduct, certain nonpublic information about you may be disclosed in the following situations:

1. To comply with a validly issued and enforceable subpoena or summons.
2. In the course of a review of our firm's practices under the authorization of a state or national licensing board, or as necessary to properly respond to an inquiry or complaint from such licensing board or organization.
3. In conjunction with a prospective purchase, sale or merger of all or part of our practice, provided that we take appropriate precautions (for example, through a written confidentiality agreement) so that the prospective purchaser or merger partner does not disclose information obtained in the course of the review.
4. As a part of any actual or threatening legal proceedings or alternative dispute resolution proceedings either initiated by or against us, provided the information disclosed does not become a matter of public record.
5. To provide information to affiliates of our firm and non-affiliated third parties who perform services or functions for us in conjunction with our services to you, but only if we have a contractual agreement with the other party which prohibits them from disclosing or using the information other than for the purposes for which it was disclosed. (An example of such disclosure includes engaging a records-retention agency to store prior years' records.)

### C. Confidentiality and Security of Nonpublic Personal Information

Except as otherwise described in this notice, we restrict access to nonpublic information about you to employees of our firm and other parties who must use that information to provide services to you. Their right to further information is limited by the policies of our firm, applicable law, our Code of Ethics, and non-disclosure agreements where applicable. We also maintain physical, electronic, and procedural safeguards in compliance with applicable laws and regulations to guard your personal information from unauthorized access, alteration, or premature destruction.

As required, Just Plans maintains a Business Continuity Plan that describes steps to be taken to ensure the continuity of our business operation in the event of an unanticipated disaster. The plan has been designed to ensure client documentation will be accessible and contact between Just Plans and its clients will be maintained. If you would like a copy, please contact our office.

In accordance with federal requirements Just Plans maintains a Code of Ethics that describes our policies and procedures and how we conduct business with our clients. If you would like to receive a copy of the Just Plans Code of Ethics, please contact our office.

Thank you for allowing us to serve your investment management and retirement planning needs. We value your business and are committed to protecting your privacy. We hope you view our firm as one of your most trusted advisers and we will work to continue earning your trust. Please call us if you have any questions or if we can be of further service.

**Jim Ellman, President**

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