

The terms "Johnstone Brokerage Services, LLC" ("JBS"), as used herein, shall mean, and include all subsidiaries, parent or sister corporations, limited liability companies, partnerships or other entities or entity controlling, controlled by or under common control.

The Securities and Exchange Commission has adopted Regulation S-P, privacy rules promulgated under section 504 of the Gramm-Leach-Bliley Act. Section 504 requires the Commission and other federal agencies to adopt rules implementing notice requirements and restrictions on a financial institution's ability to disclose nonpublic personal information about consumers. Under the Gramm-Leach-Bliley Act, a financial institution must provide its customers with a notice of its privacy policies and practices and must not disclose nonpublic personal information about a consumer to nonaffiliated third parties unless the institution provides certain information to the consumer and the consumer has not elected to opt out of the disclosure.

This notice, in summary form, is intended to tell you where we obtain information about you and who has access to it once it is received by JBS.

PRIVACY POLICY

JBS is committed to safeguarding Client nonpublic information. Client confidential information receives the strictest confidentiality.

SOURCE OF INFORMATION

The information gathered about you primarily originated directly from documents that you provided us. In addition, we maintain records of each of your transactions and holdings. The Client information we have is derived from the forms you completed to receive our services and from the records that we keep pertaining to each transaction.

CONFIDENTIALITY AND SECURITY

JBS maintains secure offices and computer environments to ensure that Client information is not placed at unreasonable risk. JBS considers all information received from Client to be confidential unless Client state otherwise. Client information will only to be handled in the manner described in this notice. JBS restricts access to Client information to those employees, authorized third parties and agents who need to know specific information to effectively deliver products or services to that client. JBS has instituted measures to ascertain confidentiality of Client information in compliance with federal standards.

THIRD PARTY SHARING OF INFORMATION

JBS does not sell client information. Client information derived from the aforementioned information source may be provided to outside parties under the following conditions:

- 1. Your Independent Investment Advisor.** JBS acquires and provides operational services to your chosen outside independent investment advisors (IIA) who no longer wish to be affiliated with a broker-dealer. For JBS to provide your IIA with access to your account and your non-public information, you must provide JBS a separate third-party authorization or limited power of attorney.
- 2. Insurance Carriers & Mutual Fund Companies.** Sharing of account and transactional information with Client's insurance carrier or mutual fund companies is commonly necessary to provide continuity of service when Client is changing Registered Representatives or Investment Advisors.
- 3. Operations.** JBS shares a limited amount of information with Client's annuity, mutual fund, and annuity companies to establish accounts and execute securities transactions on Client's behalf.
- 4. File Storage.** JBS employs back-office software services and electronic file storage from third parties in the normal course of business. By agreement JBS third party affiliates are prohibited from using information about Client beyond these specified purposes.
- 5. Required by law.** Client information is provided in response to a subpoena, court order or regulatory demand
- 6. Auditors & Financial Consultants.** Financial service companies, consultants, and auditors are permitted access to Client information under strict confidentiality agreements.
- 7. Authorized by Client.** Client may, on occasion, direct JBS to provide specific information to a third party.
- 8. Third party mailing and e-mail services.** JBS uses third party mailing and emailing services to send Client account notices, invitations, and statements.