

**Privacy Policy and Procedures  
Information Security Policy and Procedures  
Jepsen Enterprises, Inc.  
July 1<sup>st</sup>, 2001**

## **Overview**

Jepsen Enterprises, Inc. ("The Firm") recognizes the importance of protecting your privacy and has implemented policies to maintain security and confidentiality of your personal information. The following policies are designed to help you understand how we use this information to serve your account(s).

The firm does not disclose any non-public, personal information about any of its customers, or former customers, to anyone, except where required by law. The firm restricts access to non-public, personal information about its customers only to those employees and/or agents who need to know that information in order to provide products and/or services to you. The firm maintains physical and procedural safeguards to protect your non-public, personal information.

## **Information We Might Receive**

Individual investors may provide personal financial information when seeking to qualify as investors. The Firm may receive copies of such private financial information in connection with the services it provides its clients. Clients generally may provide personal information on the investor qualification statement and/or account application(s), and may include information such as name, address, social security number, assets and income and similar information.

## **Access to Information**

Employee access to non-public investor information is provided in connection with the Firm's business purposes only and is granted only to The Firm's employees on a need to know basis. Access is based on the need to know such information to allow the orderly completion financing transactions. The Firm requires each of its employees who have access to investor information to protect and keep it confidential.

## **Security Standards**

The Firm continues to assess new technology to evaluate its ability to provide additional protection of investor personal information. The Firm safeguards this information in accordance with federal standards and established security standards and procedures. Measures taken in this regard include implementation of physical, electronic and procedural safeguards.

## **Sharing Information**

The Firm does not sell investor information to third parties. In the course of conducting business, the Firm discloses necessary investor information to non-brokers and other businesses including non-affiliated third parties, as allowed by law, in order to:

- Provide services required for its client financing transactions;
- Respond to a subpoena, prevent fraud, or comply with an inquiry by a government agency or regulator.

## **Opt-Out Provision**

If, at any time, The Firm deems it necessary to disclose any non-public investor information in a way that is inconsistent with this policy, we will provide advance notice of the proposed disclosure and allow every client the opportunity to opt-out of such disclosure.