



J.P. TURNER
& COMPANY

Privacy Policy

Important Information about Your Privacy

J.P. Turner values you as a customer and your privacy. This Privacy Policy describes how we collect information about you, the circumstances when we may disclose the information to others, and the safeguards we use to protect information about you. In addition, this Privacy Policy informs you how to opt-out if you do not want J.P. Turner to share information about you to others.

This Privacy Policy applies to current and former customers of J.P. Turner & Company, L.L.C., a registered broker-dealer, and J.P. Turner & Company Capital Management, L.L.C. Both companies are referred to as “J.P. Turner” in this document.

In furtherance of this policy, J.P. Turner has established appropriate standards relating to administrative, technical, and physical safeguards—

- (1) to insure the security and confidentiality of customer records and information;
- (2) to protect against any anticipated threats or hazards to the security or integrity of such records; and
- (3) to protect against unauthorized access to or use of such records or information which could result in substantial harm or inconvenience to any customer.

The Type of Non-public Personal Information We Collect

“Personal information” is non-public information we obtain about you in connection with providing you with J.P. Turner products and services. In providing our clients products and services, J.P. Turner collects and stores or archives limited detailed information about our customers. The types of information we collect may include, but is not limited to, names, addresses, phone numbers, e-mail address, social security numbers of family members, EIN numbers for businesses and trusts, personal financial information including income tax bracket, status and history, net worth data, asset lists and valuations, insurance and estate planning documents, and other personal and family data.

This information may be derived from various sources, including:

Client information forms; portfolio appraisals; financial account statements; gain/loss data; income tax returns; personal financial records; financial planning documents; insurance policies and statements; estate planning documents and personal checking/brokerage/bank/retirement plan/stock option plan statements provided to us by you or your trusted advisors to assist us in understanding your investment needs, risk tolerance, long term objectives and overall financial situation; interviews with you and members of your family; interviews or discussions with various trusted advisors including, but not limited to, your tax preparation professional, attorney, financial planner, insurance advisor, estate planning professional, broker or other trusted advisors.

Information That J.P. Turner May Disclose

To serve you better, manage our business, and provide you with the products and services you request, we may disclose personal information we collect about you to other J.P. Turner companies and to non-affiliated third parties as required or permitted by law or regulatory or industry standards and practices.

By way of example, we may disclose personal information about you to our staff, affiliates, representatives, their affiliated businesses, and third parties who provide you with financial products and services. We do not disclose personal information that we collect about you to non-affiliated third parties except to enable them to provide marketing services on our behalf, to perform joint marketing agreements with other financial institutions, or as required or permitted by law or applicable regulatory or industry standards or practices. For example, we may disclose personal information about you to third parties to:

- service and process transactions
- offer our own products and services
- protect against fraud and for institutional risk control
- respond to judicial process; or
- perform services on our behalf.

Nonaffiliated third parties may include retirement plan sponsors or third-party administrators, mutual fund companies, insurance companies and agencies, other broker-dealers, and clearing firms. We may disclose personal information about you such as your name, address, social security number, date of birth, transactional information, or other financial information when necessary for us to provide you with financial products and services or report on your account, or where disclosure is required by law or applicable regulatory or industry standards or practices. We do not disclose personal information about you to nonaffiliated companies who intend to market their products to you. For example, we will not sell your name and address to a catalogue or marketing company.

When we share personal information about you with these companies, we request that they limit their use of it to the particular purpose for which it was shared, and they are asked not to share it with others except to fulfill that limited purpose.

How Does J.P. Turner Safeguard Personal Information About You?

We maintain physical, electronic and procedural security measures to help safeguard information about you. We have internal policies governing the proper handling of client personal information. J.P. Turner has offered training to our representatives, who are obligated to take reasonable steps to protect, safeguard and properly dispose of personal information about you. Third parties that provide support or marketing services on our behalf may also receive personal information about you, and we ask that they adhere to confidentiality standards with respect to such information.

Opting Out

You have a right to “opt out” of our sharing non-public personal information about you in certain circumstances. If you do not want us to share such personal information about you (other than as required by law or applicable regulatory or industry standards or practices) with any nonaffiliated third parties, including the registered representative servicing your account if and at such time he or she leaves us to join another firm, you may contact our Compliance Department by calling our toll-free number: **1-800-800-7945**. We will be happy to comply with your request. In addition, you may contact us in writing at:

J.P. Turner & Company Privacy Department
3060 Peachtree Road NW, 11th Floor
Atlanta, GA 30305

A sample opt-out form is also located at the end of this Privacy Policy.

Opting In – Special Notice to Vermont Residents

The following section supplements our Policy with respect to clients who have a Vermont address and supersedes anything to the contrary in the above Privacy Policy with respect to those clients only.

The State of Vermont requires financial institutions to obtain your consent prior to sharing personal information that they collect about you with affiliated companies and non-affiliated third parties other than in certain limited circumstances. As explained above, we do not disclose personal information that we collect about you to nonaffiliated third parties except to enable them to provide marketing services on our behalf, to perform joint marketing agreements with other financial institutions, or as required or permitted by law or applicable regulatory or industry standards or practices. To the extent we enter into such joint marketing agreements with other financial institutions, we will only provide those institutions with your name, contact information and information about our transactions and experiences with you, unless you provide us with your written consent to share additional information (“opt-in”). In addition, except as described in this Privacy Policy, we will not share eligibility information with other J.P. Turner companies unless you opt-in.

Please note that, even if you do not opt-in, we may still share personal information, including eligibility information, as permitted by applicable law or applicable regulatory or industry standards or practices. For example, we may share information in order to process transactions or to service your account. We may also share certain other types of personal information with other J.P. Turner companies—such as your name, address, telephone number, e-mail address and account number(s), and information about your transactions and experiences with us. If you wish to receive offers for investment products and services offered by or through other J.P. Turner related entities, please notify us in writing at the following address:

J.P. Turner & Company Privacy Department/Vermont
3060 Peachtree Road NW, 11th Floor
Atlanta, Georgia 30305

Your authorization should include your name, address, telephone number and account number(s) to which the opt-in applies and should not be sent with any other correspondence. In order to process your authorization, we require that the authorization be provided by you directly and not through a third party. A sample opt-in form can be found at the end of this Privacy Policy.

What Happens If You Close Your Account or If Your Registered Representative Moves to a Different Brokerage Firm?

Our privacy policy is the same for current as well as former clients. If you close your account, in the process of transferring your investments we may share your information with the new broker-dealer or custodian that you or your representative selects. If the J.P. Turner representative who services your account leaves us to join another broker-dealer, the representative is permitted to retain copies of documents, in whatever form (including electronic form) containing personal information about you so that he or she can assist with the transfer of your account and continue to serve you at the new firm. The representative’s continuing use of information about you will be subject to the new firm’s privacy policy, and applicable laws and regulatory or industry standards and practices.

Questions

If you have questions about this Privacy Policy, you may contact your J.P. Turner representative, visit the J.P. Turner website at www.jpturner.com and click on “Privacy Policy,” or call our Compliance Department at **1-800-800-7945**. We appreciate your business and look forward to serving your financial service needs.



J.P. TURNER
& COMPANY

Privacy Policy Opt-Out Form

INSTRUCTIONS: Please complete and return this form to J.P. Turner only if you choose not to have information shared with J.P. Turner affiliates and/or nonaffiliated parties.

NOTE: If you previously sent an Opt-Out Form to J.P. Turner, no action is required.

Customer Name: _____

Customer Address: _____

J.P. Turner Account Number: _____ Daytime Phone Number: _____

Signature

Date

Please check next to the items that reflect your choices:

_____ I do not want J.P. Turner to share information about me or any accounts on which I am an account-owner with non-affiliates (except as permitted by law).

_____ I do not want J.P. Turner to share information about me with affiliates (except as permitted by law). I understand that this election on my part covers certain information about me that you might otherwise share with your corporate family. I understand that you may share your transaction or experience information about me with your affiliates and other information as permitted by law.

_____ I want to rescind my previous opt-out of information sharing with non-affiliates.

_____ I want to rescind my previous opt-out information sharing with affiliates.

Return this form to:

J.P. Turner & Company Privacy Department
3060 Peachtree Road NW, 11th Floor
Atlanta, GA 30305



J.P. TURNER
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Privacy Policy Opt-Out Form FOR VERMONT RESIDENTS ONLY

Use this form if you want to give permission to J.P. Turner to share your personal information with affiliated or non-affiliated companies.

Customer Name: _____

Customer Address: _____

J.P. Turner Account Number(s): _____

Daytime Phone Number: _____

Please check next to the items that reflect your choices:

_____ I want to opt-in and permit J.P. Turner to share my personal information with its affiliates.

_____ I want to opt-in and permit J.P. Turner to share my personal information with non-affiliated companies.

Signature

Date

Return this form to:

J.P. Turner & Company Privacy Department
3060 Peachtree Road NW, 11th Floor
Atlanta, GA 30305