



Privacy

IPS Nevada is strongly committed to protecting your privacy and believes the confidentiality and protection of customer information is one of our fundamental responsibilities. And while information is critical to providing quality service, we recognize that one of our most important assets is our customers' trust. Thus, the safekeeping of customer information is a priority for us. Accordingly, our mission requires us to emphasize protection of our customers' privacy. As financial services professionals entrusted with sensitive financial information, we respect the privacy of our customers and are committed to treating customer information responsibly. Our customer information privacy principles serve as standards for all our employees in the collection, use, retention, and security of individual customer information.

Providing Privacy Information to Customers and Responding to Inquiries

We recognize and respect the privacy expectations of our customers. We want our customers to understand our commitment to privacy in our use of customer information. As a result of our commitment, we have developed this Privacy Policy, which is the basis for the IPS Nevada, Inc. Customer Privacy Notice. This Privacy Policy is made available to all our customers upon request. A Privacy Notice will be provided to new customers at the time we establish a customer relationship.

Collection and Disclosure of Customer Information

We accumulate information about our customers from a variety of sources. Most information is provided to us by customers themselves. We may develop other information in the course of providing a product or service to a customer. Still other information may be obtained from outside sources. We will limit the collection of information about our customers to information we believe is necessary to administer our business, provide superior service, and offer opportunities that we think will be of interest to customers.

Likewise, it is our policy to disclose customer information only in limited circumstances. In particular, we will not sell or otherwise disclose customer information for the purpose of marketing another party's goods or services to our customers. In general, we will use nonpublic customer information only in accordance with the principles set out in this Policy.

Restrictions on the Disclosure of Customer Information

It is our policy not to reveal specific information about customer accounts or other personally identifiable data to unaffiliated third parties for their independent use, except as provided in this Policy.

We may share customer information with unaffiliated parties in the following circumstances:

- To help complete a customer-initiated transaction or otherwise to assist us in providing our products and services to our customers;
- In the normal course of our business (for example, in connection with confirming our customer's identity;
- As is legally required or permitted in connection with (i) investigations by law enforcement agencies, (ii) fraud investigations, or (iii) litigation;
- In the course of audits, examinations or other proceedings by regulatory agencies;
- At the request of, or with the permission of a customer; or
- As otherwise permitted or required by law.

Maintaining Customer Privacy in Business Relationships With Third Parties

When we do provide customer information to a third party, we will insist through a written agreement that the third party adhere to privacy principles similar to those to which we adhere to for keeping this information confidential. All such agreements are reviewed on a regular basis and all third party service provider programs are subject to independent testing as part of our privacy program.

Limitations on Employee Access to Information

Employee access to personally identifiable customer information is limited to those with a business reason to know such information. Employees are educated on the importance of maintaining the confidentiality of customer information and on this Privacy Policy. Because of the importance of customer privacy, all IPS Nevada, Inc. employees are responsible for maintaining the confidentiality of customer information and employees who violate this Privacy Policy will be subject to disciplinary measures.



Protection of Information via Established Security Procedures

We safeguard information according to established security standards and procedures, and we continually assess new technology for protecting information. We conduct annual compliance reviews to evaluate the effectiveness of our privacy program, and to determine whether it complies with industry best practices and applicable regulatory requirements. Our employees are trained to understand and comply with these information principles.

Fraud Investigations

When we become aware of a possible fraud, we conduct internal investigations and when we deem it appropriate, notify relevant law enforcement authorities. In the course of such investigation, it may be necessary to share customer information with appropriate third parties such as investigators, auditors or law enforcement officials.

Requests from Law Enforcement Officers

We respond to requests for information from law enforcement officers and other authorized government agents who provide us with appropriate documentation as required or permitted by law.

Employee Management and Training

The success or failure of our information security plan depends largely on the employees who implement it. We will:

- Check references and conduct background checks prior to hiring employees who will have access to customer information.
- Ask every new employee to sign an acknowledgement that includes an agreement to follow our confidentiality and security standards for handling customer information.
- Provide regular training to employees to keep them informed of the basic steps to maintain the security, confidentiality and integrity of customer information.

Information System

Information systems include network and software design, and information processing, storage, transmission, retrieval, and disposal. These systems include physical, procedural and electronic safeguards to protect customer information.

Appointment of Privacy and Safeguard Coordinator

The Board of Directors has appointed the Compliance Officer as the Privacy and Safeguards Coordinator. The Privacy and Safeguards Coordinator will be responsible for regularly monitoring and testing the financial privacy program to ensure the security and confidentiality of customer information, and will be responsible for conducting or arranging annual training.

Record Retention and Disposal

All information regarding our financial privacy program will be retained in accordance with legal requirements and industry standards, consistent with the Document Management Procedures. Records will be disposed of promptly according to the Document Management Procedures.

Operations Review

IPS Nevada's operations review program will include an evaluation of our compliance with this Privacy Policy.

Review

This Privacy Policy will be reviewed as necessary to ensure that it continues to provide adequate safeguards for customer privacy.