

J M BROWN FINANCIAL PARTNERS

Privacy Policy

J M Brown Financial Partners ("JMB") recognizes that successful client relationships are built on trust. We also recognize that our clients place a significant amount of trust in us to protect their **non-public personal information ("NPI")**. As an organization, we protect our clients' NPI by employing reasonable physical, electronic, and procedural safeguards. We are providing this privacy statement to inform you of our specific policies and procedures.

In order to comply with industry rules and regulations and suggest appropriate investment strategies, JMB collects certain, NPI about you. In fact, the more we understand about you and your needs, the better we can suggest the right financial products or services for you. As such, collecting this information about you is not only a sound business practice, but also a legal requirement of our industry.

We restrict access to your NPI to only those who need to know it in order to execute transactions and/or service your account. We require all Investment advisor representatives of JMB who handle, process, or have access to your personal information to protect the confidentiality of your information, which includes their undergoing annual training and signing written acknowledgments to comply.

CATEGORIES OF NON-PUBLIC PERSONAL INFORMATION ("NPI") WE COLLECT

We collect information about you that we obtain from applications and new account paperwork that you and your Advisor complete. Examples of such information include, but are not limited to the following: name, address, email address, social security number, date of birth, gender, marital status, dependents, tax bracket, employer, tenure with employer, occupation, bank reference, driver's license or other government issued picture identification, annual income, net worth, liquid net worth, trading experience, investment objective, time horizon, risk tolerance, source of funds to invest, investments at other firms, existing estate documents and beneficiaries, etc.

Investment advisor representatives of JMB are also independent registered representatives with Purshe Kaplan Sterling Investments ("PKS"), member FINRA & SIPC. Consequently, we also obtain information about you from your transactions with PKS, and with any nonaffiliated third parties through PKS, such as PKS' clearing firm and/or a mutual fund company or insurance company. Such information may include order and transaction history, account activity, and/or parties involved in a transaction, *et al.*

Opt Out: JMB does not sell, lease, rent, lend to or share your NPI with any non-affiliated third parties for advertising, marketing or solicitation purposes.

CIRCUMSTANCES IN WHICH WE MAY DISCLOSE YOUR NPI

In order to complete transactions with applicable custodian/clearing firm, mutual fund, insurance company, and/or research provider, we need to share your personal information with affiliated and nonaffiliated persons or entities involved in the processing or servicing of these transactions.

While this is standard practice in our industry, we do not share your personal information with any nonaffiliated third party until we execute a written agreement or receive a written policy that it will protect the confidentiality of your personal information.

We may be required by law to provide your NPI to authorized persons or entities in the following situations: (1) complying with a subpoena or summons from federal, state or local authorities, (2) responding to judicial process, and/or (3) responding to regulatory authorities, or to other inquiries as required or permitted by law.

To the extent JMB provides such information as permitted or required by law, JMB cannot be held responsible or liable in any way for complying with such requests since JMB could be subject to penalty under federal law for disclosing to you such requests for your NPI.

Former Clients: We maintain your NPI on a confidential and secure basis. We do not disclose any NPI about our former clients to anyone except as described herein and as required or permitted by law.

MAINTAINING THE SECURITY AND CONFIDENTIALITY OF YOUR NPI

JMB employs the following procedures to protect your NPI from unauthorized access:

(1) When there is no longer a reasonable business need or regulatory requirement to maintain document with your NPI, we will shred all such documents or destroy all such information to comply with Regulation S-P and its Disposal Rule.

(2) Should we have reason to doubt the current accuracy of any NPI you have provided to us, we will make a reasonable attempt to re-verify its accuracy.

HOW YOU CAN PROTECT YOUR NPI

JMB suggests that you consider taking the following precautions to do what you can to secure your NPI:

1. Protect your passwords and PINs.
2. Maintain your computer security.
3. Use your own computer.
4. Log out completely
5. Be prudent using wireless connections.
6. Check for secure websites.
7. Exercise caution when downloading.
8. Do not provide NPI in email.
9. Read your statements.
10. Secure your confidential documents.

Should you become aware of an actual or possible compromise or theft of your identity, we encourage you to contact us immediately so that we may work with you to protect the integrity of your NPI on file with us. In addition, you should consider taking the following actions:

1. File a police report
2. File a complaint with the FTC, via the ID Theft Hotline: 1-877-IDTHEFT.
3. Call the Social Security Administration Fraud Hotline: 1-800-269-0271
4. Report it to one/all of the major credit reporting agencies:

Experian: 888-397-3742

Equifax: 800-525-6285

TransUnion: 800-680-7289

5. Contact your health care provider, as Medical ID Theft is a serious crime.

Conclusion: Our relationship with you is our most important and valued asset. It is our sincere hope that we will continue to earn your trust in protecting your NPI as we employ and adhere to the policies and procedures described in this privacy statement. We invite you to contact us with any questions you may have about this Privacy Policy (7060 S. Yale, Ste. 701, Tulsa, OK 74136). We earnestly appreciate your trust, and we thank you for your business.