

**Integrated Financial Strategies  
Privacy of Customer Information  
Policy and Procedures**

As our customer, you have entrusted Integrated Financial Strategies (IFS) to help you work towards financial success and security. To maintain that trust, we are committed to protect the privacy and security of the personal information that we collect about our customers. This notice is intended to help you understand how we collect, handle, and safeguard that information.

We treat the personal information of our customers in a confidential manner. We do not provide any information to unrelated companies for the purpose of marketing their products or services to our customers.

When you establish a relationship with us, you are requested to furnish personal and financial information used to assist in assessing your investment objectives and goals. The information you share with us is often private and confidential, and we are therefore committed to its protections. In addition to the information collected, during the course of our relationship we may also collect a variety of nonpublic personal information from other sources. The confidential information we collect may include the following:

1. Information we receive from you, such as your name, address, social security number, assets, income, investment objectives and other information as required by Industry Regulators.
2. Information about your transactions, including balances, portfolio holdings, cash balances, margin balances, and customer statements. Also included may be portfolio evaluations.
3. Information we receive from our broker/dealer—Securities America, Inc., our correspondent clearing broker—Pershing, various fund sponsors, unaffiliated custodians and money managers, your accountant, attorney or other professional obtained by you.
4. Medical or health information that you the customer authorize us to receive from doctors or other health care providers and medical vendors in relation to the advice provided on a traditional or variable life policy.

IFS does not share customer information with any third party (unless required to do so by regulation or law) other than those that are authorized by you or that are required in order for us to provide services agreed upon by the client, to service an account, or to execute a transaction. We may share information with our Broker/Dealer, Securities America, its clearing correspondent Pershing, a third party money manager or unaffiliated custodian as is necessary in order to provide advisory services.

IFS has established policies to maintain physical, electronic, and procedural safeguards to maintain the confidentiality of the personal information of our customers. Appropriate measures are taken to ensure that access is available to those individuals who need to know that information in order to provide our products and services. The following is a brief description of the SEC regulation and how IFS has taken steps to comply with it:

**1. Privacy of Client Financial Information (Regulation S-P)**

As a result of the new enacted Regulation S-P, Integrated Financial Strategies. (IFS) has adopted policies and procedures reasonably designed to (a) ensure the confidentiality of customer records and information; (b) protect against any anticipated threats or hazards to the security of customer records and information; and (c) protect against unauthorized access to or use of customer records or information that could result in “substantial harm or inconvenience” to any consumer. The privacy provisions of Regulation S-P will apply to information that is “nonpublic personal information.”

**Definitions according to Regulation S-P**

**Nonpublic information**, under Regulation S-P, includes “personally identifiable financial information” and any list, description, or grouping that is derived from personally identifiable financial information.

**Personally identifiable financial information** is defined to include three categories of information:

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and advisory services through Securities America Advisors, Inc.  
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- **Information Supplied by Client.** Any information that is provided by a client or prospective client to IFS in order to obtain a financial product or service. This would include information or material given to IFS when entering into an investment advisory agreement.
- **Information Resulting from Transaction:** Any information that results from a transaction with the client or any services performed for the client. This category would include information about account balances, securities positions, or financial products purchased or sold through a broker/dealer.
- **Information Obtained in Providing Products or Services.** Any information obtained by IFS from a consumer report or other outside source which we use to verify information that a client or prospective client has given on an application for advisory services.

## 2. The Company's Privacy Policy

As general policy, IFS will not disclose personal financial information about any client to non-affiliated third parties except as necessary to establish and manage the client's account(s) or as required by law. In these situations, personal financial information about a client may be provided to the broker/dealer or other custodian maintaining these accounts. In addition, IFS will restrict access to clients' non-personal financial information to those employees who need to know such information in order to provide products or services to clients. IFS will maintain physical, electronic, and procedural safeguards that comply with federal standards to guard each client's personal financial information. Such safeguards include restricting the use of any information contained on the Financial Information Worksheet to each client's personal financial planner, IFS's operations director or such other persons deemed as needing to know the information. Hard copy of client personal financial information will be maintained in IFS's central files, and will be secured (locked) after normal business hours. Electronic access to client personal financial information (through IFS's local area network) will be restricted to only those individuals deemed appropriate.

## 3. Delivery of IFS's Privacy Notice.

Each client will be provided with a copy of IFS's Privacy Notice upon opening his/her account. In addition, each active client will be provided with a copy of the Privacy Notice annually.