

Compak Privacy Policy / Continuity Plan

At Compak Asset Management, Inc. ("CAM") and Compak Securities, Inc. ("CSI"), we understand our obligation to keep information about you secure and confidential. We will inform you of our policies for collecting, using, securing, and sharing personally identifiable and/or nonpublic personal information ("Customer Information") the first time we do business and every year that you remain a customer with us. Therefore, we maintain the following principles with respect to protecting your privacy:

- We are committed to protecting your privacy at all times;
- We do not sell or disclose any nonpublic personal information about you to anyone except as permitted by law or with your consent;
- We do not provide customer information to persons or organizations outside the affiliated companies who are doing business on our behalf, for their own marketing purposes;
- We contractually require any person and/or organization providing products or services to customers on our behalf to protect the confidentiality of our customer information;
- We afford prospective and former customers of the same protections as existing customers with respect to the use of personal information;

Information We Collect

We collect and use various types of information we believe is necessary to administer our business, and to offer you the best possible customer service. Customer information we collect is categorized into the following types:

- Information we receive from you on applications, or on other forms, through telephone, in-person interviews, or online forms, such as your name, address, phone number, social security number, e-mail address, IP address, biometric information, your assets, liabilities, income and other household information;
- Information about your transactions and account experience with us or others, such as your account balance, transaction history;
- Information from consumer reporting agencies, such as information regarding your creditworthiness or credit history;
- Information from visitors to our website provided through online forms, site visitor data and online information collecting devices such as "cookies."
- Other general information we obtain about you that is not assembled for the purpose of opening an account or offering certain products or services that you may request, such as demographic information.

Information We Share

The information we share helps us bring you greater convenience and more choices as a customer. We limit who receives Customer Information and what type of information is shared. Unless you tell us not to, we may share all five types of Customer Information among ourselves and with other third-party financial services companies as part of the ordinary course of providing financial products and services to you, for the purposes of offering you new products and services to address your financial needs, for product development purposes, and as otherwise required or permitted by law.

Such third party financial services companies may include other financial service providers such as brokerage firms, investment adviser firms, insurance companies and payment processing companies; and may also include non-financial companies such as check printing, data processing companies, and non-affiliated companies that provide us with Internet based tools and services that assist us in providing services to you such as financial planning. These companies might assist us, for example, in fulfilling your service request, processing your transaction, mailing account statements, or providing financial planning analysis and advisory services.

For a list of companies affiliated with CAM and CSI please see below.

In addition, we may share any of the five types of Customer Information with companies that work for us to provide marketing and other services or other financial institutions or vendors with which we have joint marketing agreements. All of these companies that are acting on our behalf, are contractually obligated to keep the information that we provide to them confidential, and use the information only to provide the services we've asked them to perform.

Limitations to Sharing Customer Information

You can limit information shared about you. If you do not want us to share information from your applications, consumer reports or from other outside sources, please tell us of this request by notifying us through one of the following methods:

- **Writing to:**
Compak
1801 Dove Street
Newport Beach, CA
- **Calling us at:**
(949) 679-2500

Please note that this request will apply to customer application information, consumer reporting agencies and/or other outside sources only and may take up to 30 days to be fully effective. Through the normal course of doing business, including servicing your accounts and better serving your financial needs, we will continue to share transaction and account experience information, as well as other general information among our affiliated companies.

Disclosing information in other situations

Under certain circumstances, we may be required by law to disclose your personal information. We may also disclose personal information to protect our legal rights, enforce our Customer Agreement, or to explain our actions to professional organizations that we or our employees belong to. We may disclose certain Customer Information to credit bureaus and similar organizations, and otherwise when permitted by law. For example, this may include:

- A disclosure in connection with a subpoena or similar legal process;
- A fraud investigation;
- Recording of deeds of trust and mortgages in public records;
- An audit or examination;
- The sale of your account to another financial institution.

Keeping up-to-date with our Privacy Policy

We will provide notice of our privacy policy annually, as long as you maintain an ongoing relationship with us. If, at any time in the future, it is necessary to disclose any of your nonpublic personal information in a way that is inconsistent with this policy, we will give you advance notice of the proposed change so that you may have the opportunity to opt out of such disclosure. Additionally, since this policy may change from time to time, you can always review our current policy by contacting us for a copy at: (949) 679-2500 or visiting our website at www.compak.com

CAM & CSI Affiliated Companies & Non-Affiliated Companies

Affiliates to whom we may disclose personal information about you may be categorized in several different businesses, including securities and insurance. The following is a list, as of January 15, 2019, of all companies affiliated with CAM and CSI to which this policy applies:

Affiliated Entities

- Compak Asset Management
- Compak Securities, Inc.

Non-Affiliated Brokerages, Fund Distributors, and Investment Firms

- Fidelity Investments

Electronic Document & Signature Provider

- DocuSign

Information Security

We are committed to preventing others from authorizing access to your customer information, and we maintain procedures and technology designed for this purpose. We take several steps to protect the customer information we have about you, including the following:

- We maintain physical, electronic and procedural safeguards to protect your information;
- We restrict access to information about you to those employees who need to know that information to provide you with the best possible products and services;
- We require outside companies and independent contractors to whom we provide customer information for marketing, servicing or processing purposes to enter into a confidentiality agreement that restricts the use of such information to be used for specific purposes as intended, and prohibits the independent use of such information;
- We update and test our technology on a regular basis in order to improve the protection of customer information;
- We have internal procedures that limit access to customer information to only those members who are considered "authorized" personnel.

FINRA Public Disclosure Information

FINRA Conduct Rule 2280, requires the following information be provided to you: (1) The FINRA Regulation, Inc. Public Disclosure Program hotline number is 1-800-289-9999; (2) The FINRA Website address is, www.FINRA.org, and (3) The FINRA has a brochure available describing the public disclosure program.

Securities Investor Protection Corporation ("SIPC")

You may obtain information about the SIPC, including the SIPC brochure, by contacting them directly at (202) 371-8300 or visiting their website at www.sipc.org.

Important Information about Procedures for Opening and Servicing an Account

To help the government fight the funding of terrorism and money laundering activities, Federal law requires all financial institutions to obtain, verify, and record information that identifies each person who opens an account.

What this means for you: When you open an account, we will ask for your name, address, date of birth and other information that will allow us to identify you. We may also ask to see your driver's license or other identifying

If you have any questions about your personal or account information or about our privacy policies and practices, please feel free to contact us at (949) 679-2500.

Fidelity Investments is an independent company, unaffiliated with Compak Asset Management. Fidelity Investments is a service provider to Compak Asset Management. There is no form of legal partnership, agency affiliation, or similar relationship between your financial advisor and Fidelity Investments, nor is such a relationship created or implied by the information herein. Fidelity Investments has not been involved with the preparation of the content supplied by Compak Asset Management and does not guarantee or assume any responsibility for, its content. Fidelity Investments is a registered service mark of FMR LLC. Fidelity Clearing & Custody Solutions provides clearing, custody, and other brokerage services through National Financial Services LLC or Fidelity Brokerage Services LLC, Members NYSE, SIPC.

Compak Business Continuity Plan Disclosure

Recognizing how important it is to you that we make every effort to keep the unexpected from interfering with our operations, we have developed a series of contingency and disaster recovery plans. These plans provide detailed, pre-tested procedures for dealing with events such as fires, power outages, evacuations, severe weather, destructive acts, and other circumstances that could disrupt business continuity.

The plans have three goals:

1. To prevent events and impacts that are within our control
2. To ensure the continued operation of all aspects of our business and services in any circumstances, to the extent possible.
3. To speed the resumption of any disrupted business activities and the recovery of any lost data as quickly as reasonably possible with minimal interruption, depending on the nature and extent of the business disruption

Based on an enterprise-wide review of financial and operational risks, we have put in place contingency and disaster recovery plans that include these major elements:

- Backup and recovery technologies for all mission-critical systems
- Alternate customer communications systems, including rerouting of critical hotline numbers
- Alternate physical site locations and temporary housing for essential personnel
- Access contingencies for technology and telecom systems
- Procedures for notifying customers in the event of a service disruption, including information on length of the disruption and instructions for contacting Compak, and support information

Most types of service disruptions should not affect your access to your account or your ability to withdraw available funds. However, your ability to trade securities may be affected by events beyond our control.

Our contingency and disaster recovery plans are reviewed and updated regularly to ensure that they allow for changes in technology, business operations, regulations, and physical facilities. This notice will be updated any time there are material changes. For a current copy of this notice, go to www.compak.com or contact a Compak representative.

Compak
1-800-388-9700
(949) 679-2500