

FACTS**WHAT DOES SMARTPLAN INVESTING DO WITH YOUR PERSONAL INFORMATION?****Why?**

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

What?

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security number and income
- Employment information and wire transfer instructions
- Investment experience and risk tolerance

When you are *no longer* our customer, we continue to share your information as described in this notice.

How?

All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons SmartPlan Investing chooses to share; and whether you can limit this sharing.

| Reasons we can share your personal information | Does SmartPlan Investing share? | Can you limit this sharing? |
|---|---------------------------------|-----------------------------|
| For our everyday business purposes— such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus | Yes | No |
| For our marketing purposes— to offer our products and services to you | Yes | Yes |
| For joint marketing with other financial companies | No | We do not share. |
| For our affiliates' everyday business purposes— information about your transactions and experiences | Yes | No |
| For our affiliates' everyday business purposes— information about your creditworthiness | Yes | Yes |
| For our affiliates to market to you | Yes | Yes |
| For nonaffiliates to market to you | No | We do not share. |

To limit our sharing

- Call (561) 744-9547

Please note:

If you are a *new* customer, we can begin sharing your information 30 days from the date we sent this notice. When you are *no longer* our customer, we continue to share your information as described in this notice.

However, you can contact us at any time to limit our sharing.

Questions?

Call (561) 744-9547

| Who we are | |
|--|---|
| Who is providing this notice? | Financial Planning Counselors, Inc., d/b/a SmartPlan Investing |
| What we do | |
| How does SmartPlan Investing protect my personal information? | To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings. |
| How does SmartPlan Investing collect my personal information? | We collect your personal information, for example, when you <ul style="list-style-type: none"> ■ open an account or make deposits or withdrawals from your account ■ seek advice about your investments or tell us about your investment or retirement portfolio ■ enter into an investment advisory contract |
| Why can't I limit all sharing? | Federal law gives you the right to limit only <ul style="list-style-type: none"> ■ sharing for affiliates' everyday business purposes—information about your creditworthiness ■ affiliates from using your information to market to you ■ sharing for nonaffiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing.</p> |
| What happens when I limit sharing for an account I hold jointly with someone else? | Your choices will apply to everyone on your account. |
| Definitions | |
| Affiliates | Companies related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> ■ <i>Financial Planning Counselors, Inc., d/b/a SmartPlan Investing</i> ■ <i>Covenant Financial, Inc., d/b/a SmartPlan Financial Services</i> |
| Nonaffiliates | Companies not related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> ■ <i>SmartPlan Investing does not share with nonaffiliates so they can market to you.</i> |
| Joint marketing | A formal agreement between nonaffiliated financial companies that together market financial products or services to you. <ul style="list-style-type: none"> ■ <i>SmartPlan Investing doesn't jointly market information.</i> |
| | |
| | |