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FJY FINANCIAL  
PRIVACY NOTICE

[fjyfinancial.com](http://fjyfinancial.com)

At FJY Financial, LLC (“FJY”, “we”, “us” or “our”), protecting your privacy is very important to us. We realize that you have entrusted us with private personal and financial information, and it is important that you know our policy concerning what we do with that information. This “Privacy Notice” describes how we collect, store, use, disclose and protect your personal information that may directly, or indirectly, identify you during and after your working relationship with us and/or through our “Website”. We use the term “personal information” to describe the non-public personal information that can be associated with you and can be used to identify you. Personal information does not include information that does not identify a specific person or that is publicly available. In particular, this Privacy Notice describes the basis upon which and for what purposes we process your personal information, how we share your personal information and how we protect and safeguard your personal information.

By working with us and using our Website, you agree to the terms and conditions of this Privacy Notice as more fully described below.

**What Information We Collect and From Whom We Collect It**

When you engage FJY to provide investment advice, investment products or other services, and, when you use our Website, we may collect certain information relating to that use and/or then engagement, some of which may be personal information including:

- Information you provide us in investment advisory agreements, brokerage account applications, and other documents you complete in connection with the opening and maintaining your accounts with us. This personal information includes but is not limited to such things as your name, birth date, social security number, address and telephone numbers, occupation, net worth, annual income and account numbers and transaction history.
- Information we receive from you in order to determine your investor profile, e.g., demographic information, investment preferences, location information, or financial information;
- Information we receive from third parties, such as brokerage firms and your transactions with us or with third-parties, including other financial professionals; and
- Information we collect from cookies on our website.

When you access our Website, we, or third parties we hire to track how our Website is used, may place small data files called “cookies” on your browser or other access device. Cookies are pieces of data stored on your device and are assigned by a web server to the browser on your device.

*For more information, please visit our [Cookie Policy](#).*

### **What Information We Disclose and To Whom We Disclose It**

FJY permits only authorized employees and affiliates who have signed a copy of FJY’s Privacy Policy to have access to client information. Employees violating FJY’s Privacy Policy will be subject to FJY’s disciplinary process. Additionally, whenever FJY hires other organizations to provide services to FJY’s clients, FJY will require them to sign confidentiality agreements and/or the Privacy Policy.

It is the policy of FJY to restrict access to all current and former clients’ information (i.e., information and records pertaining to personal background, investment objectives, financial situation, tax information/returns, investment holdings, account numbers, account balances, etc.) to those employees and affiliated/nonaffiliated entities who need to know that information in order to provide products or services to the client. This may also include providing personal information and account information to brokers, insurance providers, accountants and other financial service parties. We will provide such third parties only with the limited information necessary for them to provide requested services.

Because privacy is a priority to us, we will not otherwise disclose nonpublic personal information about you to anyone without your consent. In addition, we will not sell or market your personal identifying information.

Furthermore, we do not disclose any nonpublic personal information about you to third parties, except in the following circumstances:

- When required to execute transactions for your account or otherwise to provide services you have requested (such as broker dealers, custodians, etc.). You have entered into separate agreements with your account custodian (e.g., Schwab) and they have provided their privacy policy directly to you.
- When a non-financial company performs services for FJY such as operational or administrative services. In such cases, all companies with whom we do business are contractually obligated to comply with FJY’s standards regarding security and confidentiality, and the information can be used only for the sole purpose of providing service we have requested of the company to perform.
- When you have specifically authorized us to do so (such as family members, attorneys, CPAs or other professional advisors). In which case we will do so using secure and/or encrypted communication methods and emphasize the confidential nature of the information being shared.

## **How We Protect Information**

We treat information in a confidential manner. We restrict access to your nonpublic personal information to our employees. All employees are trained and required to safeguard such information.

FJY maintains physical, electronic, and procedural safeguards that comply with federal standards to protect its clients' personal information pursuant to our Cybersecurity Policy including, daily backups of our computer information in a secure environment; anti-virus, anti-malware, anti-spyware, and anti-ransomware protection software; password protection and, in some instances, multi-factor authentication, requirements to access to client information. Through this policy and its underlying procedures, FJY attempts to reduce threats to breach the security or integrity of client records and information.

By disclosing your personal information to FJY, you consent to the collection, storage, and processing of this information by us in a manner consistent with this Privacy Notice.

## **Updating and Correcting Your Personal Information**

Keeping your information accurate and up to date is very important. You may review or update certain account information by contacting us. If your personal or account information is incomplete, inaccurate or not current, please contact us at (432) 570-1305.

## **How Long Your Personal Information Will Be Kept**

We will keep your personal information while you have an account with us or while we are providing investment advisory services to you. Thereafter, we will keep your personal information for as long as is necessary:

- To respond to any questions, complaints or claims made by you or on your behalf;
- To show that we treated you fairly; or
- To keep records required by law.

We will not retain your personal information for longer than necessary for the purposes set out in this Privacy Notice. Different retention periods apply for different types of personal information.

## **Other Information**

**Linking to Other Websites:** We may provide links to third party websites. If you follow links to third-party websites not affiliated or controlled by FJY, you should review that third-party's privacy and security policies and other terms and conditions, as they may be different from our Privacy Notice. We do not guarantee and are not responsible for the privacy or security of these third-party websites, including the accuracy, completeness, or reliability of their information.

**Closed or Inactive Accounts:** If you decide to close your account(s) or become an inactive client, our Privacy Notice will continue to apply to you.

**Changes to This Privacy Notice:** This Notice was last updated on date noted above. We may change this Notice from time to time. Please review it periodically. If we make changes to this Privacy Notice, we will revise the “Effective Date” at the bottom of this page. Any changes to this Privacy Notice will become effective when we post the revised Privacy Notice on the Website. Your use of our Website following these changes means that you accept the revised Privacy Notice

**How To Contact Us:** Please contact us by USPS, email or telephone if you have any questions about this Privacy Notice, what information we collect about you, how we share your personal information or how we safeguard your personal information.

Our contact details are shown below:

Larry Adams, Chief Compliance Officer, FJY Financial, LLC, 3100 North A Street, Suite B-125, Midland, TX or (432) 570-1305.

*Effective September 13, 2021*