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## Planning Capital Management Corporation

### Privacy Notice

Planning Capital Management Corporation (“PCMC”) maintains physical, electronic, and procedural safeguards that comply with federal standards to protect its clients’ nonpublic personal and financial information (“information”). Through this policy and its underlying procedures, PCMC attempts to secure the confidentiality of client information and protect against anticipated threats or hazards to the security or integrity of client records and information.

It is the policy of PCMC 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 to provide products or services to the client. PCMC may disclose the client’s information if PCMC is: (1) previously authorized to disclose the information to individuals and/or entities not affiliated with PCMC, including, but not limited to the client’s other professional advisors and/or service providers (i.e., attorney, accountant, insurance agent, broker-dealer, investment adviser, account custodian, etc.); (2) required to do so by judicial or regulatory process; or (3) otherwise permitted to do so in accordance with the parameters of applicable federal and/or state privacy regulations. The disclosure of information contained in any document completed by the client for processing and/or transmittal by PCMC in order to facilitate the commencement, continuation, or termination of a business relationship between the client and a nonaffiliated third party service provider (i.e., broker-dealer, investment adviser, account custodian, insurance company, etc.), including information contained in any document completed and/or executed by the client for PCMC (i.e., advisory agreement, client information form, etc.), shall be deemed as having been automatically authorized by the client with respect to the corresponding nonaffiliated third party service provider.

PCMC permits only authorized employees and affiliates who have signed a copy of the [PCMC Privacy Policy Acknowledgement](#) to have access to client information. Employees violating PCMC’s Privacy Policy will be subject to PCMC’s disciplinary process. Additionally, whenever PCMC hires other organizations to provide services to PCMC’s clients, PCMC will require them to sign confidentiality agreements and/or the Privacy Policy Acknowledgement. Furthermore, PCMC utilizes a Letter of Authorization & Client Consent to Disclose Information form. This allows PCMC, with the client’s authorized signature, to disclose the client’s information and/or take instruction from those persons or professionals specified on the document.

Should you have any questions regarding the above, please contact the PCMC office. Please note that you may obtain additional information regarding our obligation of confidentiality by visiting the SEC’s website and viewing Regulation S-P ([sec.gov/rules/final/34-42974.htm](https://www.sec.gov/rules/final/34-42974.htm)).