

Disciplined Equity Management, Inc. Privacy Policy

January 1st, 2011

Disciplined Equity Management, Inc. (DEM) requires that you provide current and accurate financial and personal information. DEM will protect the information you have provided in a manner that is safe, secure, and professional. DEM and its employees are committed to protecting your privacy and to safeguarding that information.

Safeguarding Customer Documents

We collect non-public customer data in checklists, forms, in written notations, and in documentation provided to us by our customers for evaluation, registration, licensing, or related consulting services. We also create internal lists of such data.

During regular business hours access to customer records is monitored so that only those with approval may access the files. During hours in which the company is not in operation, the customer records will be locked.

No individual who is not so authorized shall obtain or seek to obtain personal and financial customer information. No individual with authorization to access personal and financial customer information shall share that information in any manner without the specific consent of a firm principal. Failure to observe DEM's procedures regarding customer and consumer privacy will result in discipline and may lead to termination.

We will maintain personally identifiable information about you during the time you are a client, and at least for the time period thereafter that such records are required to be maintained by federal securities laws. If we choose to dispose of records after the required retention period, documents containing personally identifiable information will be destroyed by any means necessary in order to render them unusable.

Sharing Nonpublic Personal and Financial Information

DEM is committed to the protection and privacy of its customers' and consumers' personal and financial information. DEM will not share such information with any nonaffiliated third party except:

- When necessary to complete a transaction in the account, such as with the clearing firm or account custodians;
- When required to maintain or service a customer account;
- To resolve customer disputes or inquiries;
- With persons acting in a fiduciary or representative capacity on behalf of the client;
- With rating agencies, persons assessing compliance with industry standards, or to the attorneys, accountants, and auditors of the firm;
- In connection with the sale or merger of DEM's business;
- To protect against or prevent actual or potential fraud, identity theft, unauthorized transactions, claims, or other liability;
- To comply with federal, state, or local laws, rules, and other applicable legal requirements;
- In connection with a written agreement to provide investment management or advisory services when the information is released for the sole purpose of providing the products or services covered by the agreement;
- or
- In any circumstances with the customer's instruction or consent

Opt-Out Provisions

It is not a policy of DEM to share nonpublic personal and financial information with affiliated or unaffiliated third parties except under the circumstances noted above. Since sharing under the circumstances noted above is necessary to service client accounts or is mandated by law, there are no allowances made for clients to opt out.

Please call us at (904) 222-0280 if you have any questions. Your privacy, our professional ethics, and the ability to provide you with quality financial services are very important to us.