



## **1. PRIVACY POLICY**

### **Processes that keep your investments safe**

Our security procedures have been carefully designed, tested, and implemented to ensure the safety of your account and personal information, and financial assets

### **Our Systems**

- We utilize advanced firewalls to keep unauthorized parties from gaining access to your personal information, as well as anomaly detection and intrusion detection technology to alert us to unusual behavior in your account.
- Firewalls keep our public Web servers separate from the servers that contain your account and personal data, so they can't be accessed directly from the Internet.
- Our secure Web site uses 128-bit encryption on the transmission of all data transmitted between our Web site and your computer.

### **Our Policies**

- We ask you to select four security questions to answer, to be presented to you when it seems an extra check of your identity is warranted, creating an extra layer of security for your account.
- Internally, access to client information is limited by a well-established computer security approach called "least privilege access" and is firewall-controlled.
- Our employees are thoroughly trained in our policies and how to uphold them.
- If we detect suspicious activity in your account, we'll block access to it until you call us. We do this to validate that the account activity was intended by you, and to protect you in case it was not.
- Our privacy policy reflects the standards we adhere to.
- The Asset Protection Guarantee protects your assets in case of unauthorized activity.



## Our Partners

- We partner with leading firms in the security industry to bring you security products to protect your system and your identity.

Facts	What does JLTCM 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?	<p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <p>Social Security number and financial account numbers</p> <p>Account balances and transaction information</p> <p>Income and employment information</p>
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 TD Ameritrade chooses to share; and whether you can limit this sharing.

## **2. BUSINESS AND CONTINUITY PLAN**

*Secure and reliable access to your account information is one of our highest priorities, In the event of a disruption; we've developed a plan that is intended to permit the firm to maintain business operations.*

“JLTCM is committed to providing our clients with secure and reliable access to their accounts. This commitment includes providing information regarding plans to address disruptions in our business operations due to power outages, natural disasters, or other significant events. In the event of disruption, JLTCM has a Business Continuity Plan that is intended to permit the firm to maintain business operations such as processing client orders and transactions in client accounts.

Although JLTCM has taken significant steps to develop and implement sound business recovery practices, after a significant business disruption, clients may still experience service disruptions, or reduced services or access as the firm recovers. We continually assess, update, and test our plans to ensure that JLTCM plans are robust and are consistent with many of the best practices in the industry. Any modifications to our plan



JLTCM Website/Marketing

will be reflected in this Business Continuity Plan Statement, which will be posted on our website.”

### **3. AML DISCLOSURE**

Money laundering is a serious crime potentially related to the funding of terrorist activities. It is the subject of extensive federal regulations that impose requirements on financial institutions, such as broker-dealers and their RRs, to detect and prevent potential money laundering activities. This is an obligation of every RR of JLTCM.

Engaging in money laundering is a federal crime with severe penalties for those engaged in criminal activities and those who facilitate, intentionally or inadvertently money laundering. It is important that JLTCM, as well as all RRs, remain diligent and active participants in JLTCM’s money laundering program.

JLTCM has Anti-Money Laundering Program Compliance and Supervisory Procedures which set forth in detail the procedures it has adopted to prevent and detect potential money laundering activity. All of JLTCM’s RR’s are required to comply with JLTCM’s anti-money laundering procedures.

All RR’s are obligated to promptly report to the AML Compliance Officer any known or suspected violations of anti-money laundering policies as well as other suspected violations or crimes. If the potential violation implicates the AML Compliance Officer, it should be reported to a senior officer of JLTCM. All reports are confidential and the RR will suffer no retaliation for making the. Crimes or suspected crimes by individuals (whether associated with JLTCM, a customer, or prospective customer) are required to be reported. There is no clear definition of what constitutes as a “crime.” If an RR believes some improper or illegal activity is occurring, it is the RR’s obligation to report it.

### **4. LINKS TO SPECIFIC WEBSITES**

**FINRA**

<http://www.finra.org/>

**SIPC**

<http://www.sipc.org/>