

By accessing our Site or our Service, you accept the DPL Financial Partners, LLC (DPL) Privacy Policy and you consent to our collection, storage, use, and disclosure of your Personal Information as described in the Privacy Policy. This Privacy Policy applies solely to information collected by us through the Site and the Service.

DPL refers to DPL Financial Partners, LLC (DPL) and its affiliates. Our Privacy Policy is designed to help you understand how we collect, use, and safeguard the information you provide to us and to assist you in making informed decisions when using our Service.

DPL Services refers to services accessed via a DPL website, telephone, email or in-person meetings with an authorized DPL representative. DPL Services includes insurance and annuity product comparison and consulting services, as well as product and market information for Registered Investment Advisors (RIAs). DPL Services also includes access to commission-free insurance products from our carrier partners and affiliates.

The terms “we,” “us,” and “our” refer to DPL. “You” refers to you, as a visitor of our websites or user of DPL Services.

#### **INFORMATION WE COLLECT**

We collect Non-Personal and Personal Information. Web-metrics are collected via cookies that cannot be used to personally identify you, such as usage data, demographic information, referring URLs, operating systems, platform types, preferences, and number of clicks. Personal Information that you submit to us is collected as well, such as your email address, address, phone number, date of birth, employer, and more.

To activate the Service you will need to submit Personal Information including your name, state of residence, email address, and phone number. For advisors, we also request the a firm name, CRD Number and assets under management. By registering on our website or with us and our service providers directly, you are authorizing the collection, storage and use of your information in accordance with this Privacy Policy.

#### **HOW INFORMATION IS USED AND SHARED**

We do not sell or share your personal information for marketing purposes without your consent. We do share your personal information with our affiliates and vendors who are performing services in the natural course of Company's business. These affiliates and vendors are held to the same standards of this Privacy Policy.

If DPL merges, is acquired, or otherwise effected by a business transaction, the personal information and metrics collected will be shared with the other parties to the resultant organizations to continue providing the Service under the same or similar terms.

#### **HOW WE PROTECT INFORMATION**

Your account is protected by your account password and we urge you to protect your password and log out of your account after each use. We further protect your information by implementing certain technological security measures including encryption, firewalls and transport layer security. These measures DO NOT GUARANTEE that your information will not be accessed, disclosed, altered or destroyed by breach of such firewalls and server software. By using our Service, you acknowledge that you understand and agree to assume these risks.

#### **YOUR RIGHTS**

You may opt out of marketing communications at any time by emailing us at [contact@dplfp.com](mailto:contact@dplfp.com). We must, however, continue to send you certain required administrative updates and disclosures

#### **OTHER WEBSITES**

We may provide links to outside independent third party websites or applications, and we are not responsible for the privacy practices employed by those websites or the information or content they contain. Consequently, this Privacy Policy does not apply to your use of a third-party website accessed by selecting a link on a DPL website or via DPL Services.

#### **CHANGES TO OUR POLICY**

DPL reserves the right to change this policy and our Terms of Service at any time. We will notify you of significant changes to our Privacy Policy by sending a notice to the primary email address specified in your account or by placing a prominent notice on our site.

#### **CONTACT US**

if you have any questions regarding this Privacy Policy or privacy and security practices of DPL, please contact us by contacting us at [contact@dplfp.com](mailto:contact@dplfp.com). 1906 Stanley Gault Pkwy, Louisville, KY 40223. (888) 327-0049

Johnstone Brokerage Services, LLC (JBS), as used herein, shall mean, and include all affiliates, subsidiaries, parent or sister corporations, limited liability companies, partnerships or other entities or entity controlling, controlled by or under common control.

The Securities and Exchange Commission has adopted Regulation S-P, privacy rules promulgated under section 504 of the Gramm-Leach-Bliley Act. Section 504 requires the Commission and other federal agencies to adopt rules implementing notice requirements and restrictions on a financial institution's ability to disclose nonpublic personal information about consumers. Under the Gramm-Leach-Bliley Act, a financial institution must provide its customers with a notice of its privacy policies and practices and must not disclose nonpublic personal information about a consumer to non-affiliated third parties unless the institution provides certain information to the consumer and the consumer has not elected to opt out of the disclosure.

This notice, in summary form, is intended to tell you where we obtain information about you and who has access to it once it is received by JBS.

#### **PRIVACY POLICY**

JBS is committed to safeguarding Client nonpublic information. Your confidential information receives the strictest care.

#### **SOURCE OF INFORMATION**

The information gathered about you primarily originated directly from documents, forms and web-based questionnaires that you provide us. In addition, we maintain records of each of your transactions and holdings.

#### **CONFIDENTIALITY AND SECURITY**

JBS maintains secure offices and computer environments to ensure that client information is not placed at unreasonable risk. JBS considers all information received from clients to be confidential unless clients state otherwise. Client information will only be handled in the manner described in this notice. JBS restricts access to client information to those employees, authorized third parties and agents who need to know specific information to effectively deliver products or services to that client.

JBS does not sell client information.

MEMBER FINRA & SIPC

#### **THIRD PARTY SHARING OF INFORMATION**

Client information derived from the aforementioned information source may be provided to outside parties under the following conditions:

1. Your Independent Investment Advisor (IIA). You authorize JBS to share your Financial Profile and account information with your IIA and your financial, legal, and tax representatives. You further authorizes JBS to share your account and contract information with your IIA's performance and billing consolidation software so your IIA can provide ongoing account monitoring, reporting, advice and analysis.
2. Account Providers. You authorizes JBS to share account and transactional information with your insurance or annuity carriers or mutual fund companies is necessary to provide basic operational support and fulfill basic broker-dealer obligations.
3. Operations. You authorizes JBS to share your Financial Profile and confidential information with your insurance, mutual fund, and annuity companies to establish accounts and execute transactions on your behalf.
4. File Storage. JBS employs back-office software services and electronic file storage from third parties in the normal course of business.
5. Third-party affiliates. You authorize JBS to share your Financial Profile and account information with JBS affiliates for the purpose of identifying suitable exchange opportunities that may be in your best interest.
6. Required by law. You authorizes JBS to share information in response to a subpoena, court order or regulatory demand.
7. Auditors & Financial Consultants. You authorize JBS to share your account information to financial service companies, consultants, and auditors under strict confidentiality agreements.
8. Authorized by Client. You may, on occasion, direct JBS to provide specific information to additional third parties.
9. Third party mailing and e-mail services. You authorize JBS to share your information with third party mailing and emailing services to send your account notices, reports, invitations, and statements.

#### **CONTACT US**

If you have any questions regarding this Privacy Policy or privacy and security practices of JBS, please contact us at [office@johnstonebrokerage.com](mailto:office@johnstonebrokerage.com). (936) 340-2929  
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