

PRIVACY DISCLOSURE DOCUMENT

EDMP, INC.

18534 Dale Mabry Hwy N, Lutz FL 33548

(813) 960-9600

One of EDMP, Inc.'s primary client goals is to protect your privacy. Because we respect your right to privacy, we have always placed a high priority on protecting the personal information you provide us. EDMP collects and uses personal information for legitimate business purposes and our Privacy Policy is to continue to protect your right to privacy, even beyond the laws and regulations that provide protection.

EDMP, Inc. is required to send an annual notice of our Privacy Policy, and notification when we make changes to our policies and practices.

We collect and use information necessary to administer our business, to advise you about our services, and to provide you with customer services. To conduct regular business, we may collect and maintain several types of nonpublic customer information needed for these purposes, such as:

- ▶ Information reported by you on applications or other forms provided to us by you, your consultants, brokerage firms, or others.
- ▶ Information about your transactions with us, your consultants, brokerage firms or others.

EDMP, Inc. does not share or disclose any nonpublic personal information about its current or former customers with non-affiliated third parties except in these cases:

- ▶ **As permitted or required by law**, for example; providing information to industry regulators, to The Securities and Exchange Commission, and to State Regulatory Agencies.
- ▶ **With parties that assist EDMP, Inc. in promoting our own products and services**, such as printers and mail houses. It is EDMP's policy to include confidentiality and data protection provisions in the contracts we make with these companies. We provide them with the limited information they need to perform their services for EDMP, such as names and addresses collected through our transactions.
- ▶ **In jointly marketing financial products with selected third party marketing firms**, information is provided in order to report EDMP's track record, assets under management, account sizes and number of accounts. Specific information, such as account ownership, addresses, etc. is protected through a signed confidentiality contract between EDMP and the nonaffiliated marketing firm. The agreement is designed to ensure that the third party will maintain the confidentiality of the information, except as necessary to carry out the agreement. Through the process of marketing to new institutional clients, representative lists of current institutional clients are disclosed.

Additional Privacy Principles

- ▶ We do not sell customer information.
- ▶ We do not provide customer information to persons or organizations that you have not authorized.
- ▶ We afford prospective and former clients the same protections as existing clients with respect to the use of personal information.

Information Safeguarding

EDMP maintains policies and practices that will internally safeguard your nonpublic personal information. The policies provide for:

- ▶ Restricting access to only those employees who provide products or services to you or those who need access to your information to service your account.
- ▶ Maintaining physical, electronic and procedural safeguards that meet federal and/or state standards to guard your nonpublic personal information.
- ▶ Password protection on database access for both employees and clients.
- ▶ Compliance audits.
- ▶ Employee training.
- ▶ Monitoring our computer networks and testing the strength of our security in order to help us ensure the safety of customer information.
- ▶ Backup and recovery procedures.
- ▶ Continually reviewing our policies and practices.

Internet Policies and Procedures

- ▶ EDMP, Inc. identifies and tracks the single previous web site address, which visitors have come from, when accessing our site. This is a standard industry practice used to determine how people navigate to our site.
- ▶ When a client accesses the edmpinc.com web servers, we store a cookie – a tiny piece of information – on the client's computer. This file is a technical requirement that allows us to establish and maintain a secure session so clients can request information regarding their account. The cookie contains no confidential or personal information and is not used to track client activity after leaving edmpinc.com.
- ▶ An additional layer of security, Secure Sockets Layer (SSL), through VeriSign is used to maintain the confidentiality of all information sent between the edmpinc.com web site and the client's computer. All information sent to this site, if in an SSL session, is encrypted, protecting against disclosure to third parties. Specifically requested client information, such as a user name and password is used to verify identity in order to gain access to the secure client web site.
- ▶ EDMP, Inc. collects site aggregate and client specific information about the pages accessed on the edmpinc.com web site. This information is used to improve the content of edmpinc.com.

Opt-Out Provision:

EDMP, Inc. does not sell or share information with persons or organizations, other than specifically authorized by the client, or required or permitted by law; therefore, the Opt-Out provision does not currently apply to us. However, if you would like to discuss this issue in detail, or if you have any concerns, please feel free to contact us at 1-800-351-3367.