

PRIVACY POLICY

This notice is being provided to inform clients of the Trading Advisor's (hereafter referred to as Company) consumer privacy policies as required under the CFTC rules:

In providing clients with financial products and services, Company receives nonpublic personal information about clients from the following sources:

- 1. Information we receive from you on Company's new account documents, applications and/or other forms.
- 2. Information about the client's transactions with Company, its affiliates, or others.
- 3. Information Company receives from other futures industry participants. In providing clients with financial products and services

We at Company recognize the importance of protecting your personal information and financial interests. As a financial institution and a member of NFA, the Advisor must obtain personal information about you. This information assists us in servicing your account and helps us comply with our obligations under NFA rules and CFTC regulations.

You have our assurance that:

- We are committed to safeguarding your privacy online.
- Your personal information will only be used to service your account, to improve our service to you, to fill any and all requests by you and to inform you of products and services which may be of interest to you.
- We do not sell your personal information to third parties
- We share information as part of normal business operations and as part of normal legal/regulatory purposes required by agencies such as the IRS, NFA, CFTC and other governmental agencies.

JSPM LLC is a legitimate business, all transactions are safe and secure and your privacy will be protected as required by law. JSPM LLC will provide an initial privacy notice to all new clients and each subsequent year a privacy policy will be provided even if no changes have occurred to the policy.

The categories of nonpublic personal information collected by the Firm are Name & contact information, date of birth, financial information relating to net worth and household income, employment information.

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