

FACTS

WHAT DOES SECURE INVESTMENT MANAGEMENT, LLC (“SIM”) 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 allows financial companies to share nonpublic personal information necessary for processing or administering a financial transaction requested or authorized by a consumer. In addition, federal law allows information sharing for purposes of preventing fraud, responding to judicial process or a subpoena, or complying with federal, state, or local laws. 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> <ul style="list-style-type: none"> ▪ Social Security number ▪ Account balances ▪ Employment information ▪ Transaction history with SIM or our affiliates ▪ Other personal information
How?	All financial companies need to share client personal information to run their everyday business. In the section below, we list the reasons financial companies can share their client’s personal information; the reasons SIM chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does SIM share?	Can you limit this sharing?
For our everyday business purposes— such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes— to offer our products and services to you	Yes	No
For joint marketing with other financial companies	Yes	No
For our affiliates’ everyday business purposes— information about your transactions and experiences	Yes	No
For our affiliates’ everyday business purposes— information about your creditworthiness	No	No
For our affiliates to market to you	Yes	No*
For non-affiliates to market to you	No	No

Questions?	<p>Call: (520) 269-4003</p> <p>Mail: Secure Investment Management, LLC 3067 Ina Road, Suite 125 Tucson, AZ 85741 Attention: Compliance Department</p>
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Who we are

Who is providing this notice?

Secure Investment Management, LLC

What we do

How does SIM protect my personal information?

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.

How does SIM collect my personal information?

Client non-public personal information is collected by SIM in the course of conducting business. This information may be collected from multiple sources. These sources include, but are not limited to, the collection of your information during the performance of our business operations and services, from your accounts and transactions, from applications and other forms, when processing business on your behalf, during electronic, telephone, written, and verbal communications and/or communications with you and with your authorized representatives (such as your attorney, accountant, or any other third party representative you have authorized), and from other personal information that you provide.

Why can't I limit all sharing?

Federal law gives you the right to limit only

- Sharing for non-affiliates to market to you

State laws and individual companies may give you additional rights to limit sharing.

What happens when I limit sharing for an account I hold jointly with someone else?

Your choices will apply to everyone on the account.

Definitions

Affiliates

Companies related by common ownership or control. They can be financial and nonfinancial companies.

- Our affiliates include JD Mellberg Financial, LLC, Insurance Marketing Solutions, LLC and Retirement Income, LLC.

Non-affiliates

Companies not related by common ownership or control. They can be financial and nonfinancial companies.

- We do not share information with non-affiliates for marketing purposes.

Joint marketing

A formal agreement between non-affiliated financial companies that together market financial products or services to you.

- Our joint marketing partners include other financial companies.

Other important information

For California Residents: We will not share information we collect about you with nonaffiliated third parties, except as permitted by California law, such as to process your transactions or to maintain your account.

* If you are a California resident, you have additional privacy options which are discussed in the "Important Privacy Choices for Consumers (CA Residents)" form, which will be provided to you.