



JSK ASSOCIATES INC.
"The Holistic Financial Planning Company™"



Member SIPC/FINRA

CUSTOMER INFORMATION LETTER

September 2018: Privacy Policy and Business Continuity Plan

PRIVACY POLICY

At JSK Associates Inc. ("JSK") and International Equity Services ("IES"), we are committed to protecting your privacy and the confidentiality of your personal and financial information. Pursuant to the requirements of the Gramm-Leach-Bliley Act (the "GLBA") and guidelines established by the Securities Exchange Commission regarding the Privacy of Consumer Financial Information (Regulation S-P), the Company has instituted the following policies and procedures in an effort to ensure that such non-public private information is kept private and secure.

JSK is affiliated with International Equity Services Inc. ("IES"). Both entities are independently- owned financial services companies that work together to service your financial needs. Customer accounts are opened and held at our custodian and clearing firm, Hilltop securities Inc. (HTS) who also have their own Privacy Policy. We are permitted by law to share information with our affiliates about your account history and your experiences with us. Sharing your information enables us to serve you more efficiently and makes it more convenient for you to do business with us.

Scope of Policy

This Privacy Policy covers the practices of the Company and applies to all non-public personally identifiable information, including information contained in consumer reports, of our current and former clients.

Overview of the Guidelines for Protecting Client Information

In Regulation S-P, the Securities and Exchange Commission (the "SEC") has published guidelines, pursuant to section 501(b) of the GLBA, that address the steps a financial institution should take in order to protect client information. The overall security standards that must be upheld are:

ensuring the security and confidentiality of client records and information; protecting against any anticipated threats or hazards to the security or integrity of client records and information; and protecting against unauthorized access to or use of client records or information that could result in substantial harm or inconvenience to any client.

Anti-Money Laundering (AML) Client Identity Disclosure

To help the government fight the funding of terrorism and money laundering activities, Federal law require all financial institutions to obtain, verify, and record information that identifies each person who opens an account. When you open an account, we will ask for your name, address, date of birth and other information that will allow us to identify you.

Persons Covered by the Privacy Policy

The JSK and IES Privacy Policy applies to anyone who is a current or former JSK or IES brokerage client or who registers with one of our services or promotional offers. We provide you with a copy of this policy when you open an account, and we send you annual notifications thereafter. If we change our policy regarding the

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Tel: (800) 259-7130 Fax: 914-949-9781

Securities offered through International Equity Services Inc., Member FINRA/SIPC.

The information contained herein is based upon sources believed to be true and accurate, but no guarantee is made to the completeness and accuracy of this information. This material is being provided for informational purposes only and is not intended as a solicitation for a specific product or service which can only be accomplished upon receipt of specific product information. Please consult statements provided by individual custodians or product sponsors for complete information. Past performance is not indicative of future results. Please contact JSK Associates if there are any changes in your financial situation or investment objectives, or if you wish to impose, add or modify any reasonable restrictions to the management of your account. Our current disclosure statement is set forth on Form ADV 2A and 2B, and is available for your review upon request.



sharing of information, we will notify you in advance and give you the opportunity to "opt out" of such disclosure.

Responsibility

To help the government fight the funding of terrorism and money laundering activities, Federal law requires all financial institutions, to obtain, verify, and record information that identifies each person who opens an account. When you open an account with us, we are required to collect information such as the following from you: your address, date of birth and identification number. The identification information collected will be compared to government- provided lists of suspected terrorists (OFAC: Office of Foreign Assets Control). OFAC checks are conducted annually.

Collection of Information about You

In the normal course of business, we collect, retain and use information about you to serve your financial needs, administer your account(s) and inform you of products and services that may be of interest. This data, known as non-public personal information, may be collected from several sources, including: a) applications and other forms you file with us (e.g., name, address, social security number, assets, and income), b) records of transactions with us, our affiliates, and c) non-affiliated third parties (e.g., Hilltop securities Inc.). Since we strive to provide you with the best possible service, the accuracy and completeness of your personal information is important to us. We ask that you review your information regularly to ensure that it is correct. Please contact us directly at (800) 259-7130, if you need to correct or update your personal information.

We Protect Confidentiality

JSK and IES use procedural, physical and electronic system safeguards to store and secure information about you in compliance with federal standards. Our systems protect your information from unauthorized access, alteration, and destruction. Access is permitted only to those individuals within our organization who need the information to perform their job responsibilities. We train our employees in the proper handling of personal information and the use of strict standards of care in handling of the personal, confidential information of customers and remind them on a regular basis of their obligations with regard to the confidentiality of customer information. JSK associates use information about you to respond to your needs and to provide you with information about specific products in which you may have an interest.

When we enter into agreements with other companies to provide services to us or to make products and services available to you, we include a confidentiality clause. Under such an agreement, these companies may receive information about you, but they may only use it for the intended purpose - to benefit you.

Safeguarding Of Client Records and Information

In order to further protect information, all documents are properly disposed daily and after the required retention period has elapsed by shredding.

Safeguard Monies in Your Account

In light of increased concern about identity theft, our policy to safeguard any cash withdrawals from client investment and savings accounts are as follows: 1) We only accept requests to withdraw monies from the account owner, trustee, trust administrator, or Power of Attorney (POA). (2) The request must be in writing

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either by letter or e-mail. (3) We confirm the written request verbally via telephone with client. (4) Monies disbursed by check may only be sent to the account holder's address of record. (5) Monies disbursed by direct deposit or ACH (Automated Clearing House free two-day wire) are sent directly to the account holder's linked checking account, which must be in the same name as the account held at HTS. (6) Lastly, we do not issue or forward checks, or electronically transfer monies to any third-party.

However, should the IRS rules allow an exception to make a distribution to a third party for a charitable gift to a named charity, the client must provide a signed letter of instruction authorizing the distribution, which we verify verbally with client.

In addition, Hilltop securities Inc. (HTS) will only accept transfer instructions from our broker-dealer, International Equity Services Inc. (IES) via their secure service request system. If HTS received withdrawal instructions that circumvent JSK as your investment advisor, HTS will not process the request and will re-direct it to us for verification and processing

Payment for Order Flow

As a way to attract orders from brokers, some exchanges or market-makers will pay firms for routing orders to them—perhaps a penny or more per share. This is called "payment for order flow." IES does not engage in any Payment for Order Flow arrangements. All our orders are routed to our clearing firm, HTS, where our experience indicates that the client will receive best execution.

Sharing Information-With Whom and Why

JSK and IES do not sell your personal information to anyone. We restrict the types of information we share and the types of entities with whom we share it. The primary reason for sharing information about you is to increase your convenience in transacting business with us and to give you more financial service choices. We do not disclose your personal information to non-affiliated third parties, unless one of the following exceptions applies:

We disclose personal information to service providers that assist us in processing your transactions or servicing your account(s). An example would be the company that prints and mails your account statement. We may also disclose personal information to third party service providers in an effort to improve and better market the products and services we offer. Under such agreements, these companies may receive information about you, but they may only use it for the intended purpose - to benefit you.

We disclose or report personal information in limited circumstances when we believe in good faith that disclosure is required or permitted under law. For example, we would provide information in cooperation with securities regulators or law enforcement authorities, to resolve consumer disputes, or to authenticate checks.

Internet Security

We do not retrieve account or personal information from visitors who browse the public areas of our web site. Clients who have the ability to access their accounts online are required to log on with their user name and individually selected password. Your password is known solely to you, the client, and should never be shared with anyone. You may change your password as often as you wish.

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When you access your account online, it is through a Secure Socket Layer-encrypted session between your browser and through Hilltop securities servers. To ensure the highest level of security, HTS has installed VeriSign Global Server IDs on each server. HTS will continue to enhance security procedures as new technologies become available. Each time you access your account, please do not forget to log off when you are finished. This will prevent someone else from accessing your account if you leave your computer and your session has not automatically shut down.

Complaints

Any client wishing to contact JSK or IES regarding a complaint on their account should contact our Chief Compliance Officer, Jerome Keenan at 120 Bloomingdale Road, White Plains, NY 10605 or call 1-800-259-7130.

Option to Opt Out and Change Notices

If for any reason at any time in the future, we find it necessary to disclose any of your personal information in a way that is inconsistent with this policy, we will give you advance notice of the proposed change and the opportunity to opt out of such disclosure. Additionally, should you wish to opt-out of marketing notices, please contact our Compliance Department at group@investtowin.com, call (800)259-7130, or write to the address listed below.

BUSINESS CONTINUITY PLANNING

Our business continuity planning ("BCP") first ensures the safety and security of our associates. The events of 9/11 emphasized the unique skill sets of personnel who work in our industry and the need to put their safety first so that after an interruption they are available to continue serving our customers. In addition to protecting our personnel, our BCP and daily operations are focused on preserving our critical firm and customer data through daily backups which are moved off-site via electronic copies of our data to our remote locations.

JSK and IES have developed a Business Continuity Plan on how we will respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions is unpredictable, we will have to be flexible in responding to actual events as they occur. With that in mind, we are providing you with this information on our business continuity plan.

Contacting Us

If after a significant business disruption you cannot contact us, as you usually do at (800) 259-7130, please contact us at our alternative numbers (914)420-4562 or (845)878-2223. If you cannot access us through either of those means, you should contact our clearing firm, Hilltop securities Inc. ("HTS") at (214)859-1800 and at <https://clientexp.htst.com/ies/Login> for prompt access to your account.

Highlights of Our Business Continuity Plan

We plan to quickly recover and resume business operations after a significant business disruption and respond by safeguarding our associates and property, making a financial and operational assessment, protecting the firm's books and records, and allowing our customers to transact business. In short, our

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business continuity plan is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption.

Our business continuity plan addresses: data back-up and recovery; all mission critical systems; financial and operational assessments; alternative communications with customers, associates, and regulators; alternate physical location of associates; critical supplier, contractor, bank and counter-party impact; regulatory reporting; and assuring our customers prompt access to their funds and securities if we are unable to continue our business.

Our clearing firm, HTS, backs-up our important records in a geographically separate area. While every emergency situation poses unique problems based on external factors, such as time of day and the severity of the disruption, we have been advised by our clearing firm that its objective is to restore its own operations and be able to complete existing transactions and accept new transactions and payments within four hours. Your orders and requests for funds and securities may be delayed during this period.

Varying Disruptions

Significant business disruptions can vary in their scope, such as only our firm, a single building housing our firm, the business district where our firm is located, the city where we are located, or the whole region. Within each of these areas, the severity of the disruption can also vary from minimal to severe. In a disruption to only our firm or a building housing our firm, we will transfer our operations to a local site when needed and expect to recover and resume business within two hours.

In a disruption affecting our business district, city, or region, we will transfer our operations to a site outside of the affected area, and recover and resume business within four hours. In either situation, we plan to continue in business and transfer operations to our clearing firm if necessary. We will notify you through our customer emergency numbers, (914)420-4562 and (845)878-2223 and give you information regarding how to contact us. If the significant business disruption is so severe that it prevents us from remaining in business, we will assure our customer's prompt access to their funds and securities via direct access to Hilltop securities.

FOR MORE INFORMATION:

If you have questions about our business continuity planning, or to request a hard copy you can contact us at group@investtowin.com, or group@internationalequityservices.com, or (800) 259-7130.

If you have questions or feedback, please contact us at:

JSK ASSOCIATES INC. &
INTERNATIONAL EQUITY SVCS INC
120 Bloomingdale Road, Suite 3400
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Hilltop Securities Privacy Policy and Business Continuity Plan available at:

<http://www.hilltopsecurities.com/hilltop-securities-inc-disclosures/privacy-policy/>

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