Privacy Policy of JLB & Associates, Inc. - 2019

JLB & Associates, Inc. (JLB) has adopted the following Privacy Policy to protect the privacy and security of the personal information we collect about our clients. We consider it very important to service you in a timely and efficient manner. In order to do so we must collect and maintain some personal information about you. This policy describes the type of information that we may collect and how we safeguard that information.

What Information We Collect

JLB collects certain nonpublic personal information about you, such as: your name, address, social security number, telephone number, email address, etc. We also collect information about your brokerage accounts and transactions (such as purchases, sales, account balances, etc.) This information is gathered from the following:

Account applications or other forms

Account statements from custodians/brokers

Communications in person, by telephone or in electronic form

This information may be collected from you or your authorized representative (such as accountant, attorney, etc.).

What Information We Disclose

Since our inception in 1983, JLB has not and will not disclose any nonpublic personal information we collect about our clients to anyone except:

To those parties that are involved in the furtherance of our business relationship with you and only to those parties who you have authorized to receive such information and are necessary to effect such transactions (such as custodians, broker-dealers, accountants, attorneys, etc.).

To persons assessing our compliance with industry regulations and governmental agencies (such as state authorities, or federal authorities from the Securities and Exchange Commission, etc.).

As otherwise required by law.

These third parties are prohibited from using or sharing your personal information for any other purpose.

Security of Your Information

All persons employed by JLB have agreed to follow all terms and conditions included in this Privacy Policy. JLB maintains the following physical, electronic, and procedural safeguards to protect your nonpublic personal information:

Computers at JLB are password protected.

Backups of computer data held offsite are physically protected.

Access to custodian/broker website is password protected.

Access to personal information is physically protected.

## **Former Clients**

If for any reason our Investment Advisory relationship becomes terminated or suspended, we will continue to adhere to our Privacy Policy, as may be amended in the future.

## Changes to Privacy Policy

Our policy governing the collecting and disclosing of your nonpublic personal information may change or be amended in the future. Any material change will be communicated to you prior to implementing any change.