

Client Privacy Policy for Sequent Planning

Effective Date: April 01, 2025

Introduction

This Client Privacy Policy outlines how Sequent Planning, LLC (“Sequent Planning”), a limited liability company registered as an investment adviser with the U.S. Securities and Exchange Commission (SEC) and based in Omaha, Nebraska, collects, uses, discloses, and protects the non-public personal information of its clients. As an investment adviser, Sequent Planning is committed to complying with the privacy requirements under Regulation S-P and the Gramm-Leach-Bliley Act (GLBA). The privacy and security of your personal information are of utmost importance to us, and this policy aims to explain our practices for clients in a clear and concise manner. Please refer to our Website Privacy Policy at www.sequentplanning.com for additional guidance how we use information gathered online from a user of our website.

Information We Collect

Sequent Planning may collect various types of non-public personal information (“NPI”) about a client, including but not limited to, the following:

- **Personal Identifiers:** Your name, address, email address, telephone number, date of birth, Social Security number, driver’s license or ID information, and other contact details.
- **Financial Information:** Account numbers and holdings, bank account and routing information, investment assets, transaction history, income sources, tax status, insurance policy information (excluding any health/medical details), and credit or debit information relevant to your financial plan.
- **Profile Information:** Your risk tolerance, investment objectives, employment status, family information (such as marital status or number of dependents), and other details you share with us to help tailor our advice.
- **Online Information:** If you use our website or electronic client portal, we may collect login credentials, IP address, and usage data. (Our online services may have a separate notice regarding cookies or tracking, if applicable.)

Third-Party Sources (with your authorization): In some cases, we receive information about you from third parties. For example, if your relationship with Sequent Planning began through an insurance agent who is also one of our investment adviser representatives, that agent or their insurance agency may, **with your consent**, provide us with information you gave them (such as financial data or policy details) so that we have a complete picture of your financial situation. We treat any such incoming information with the same care as information you provide directly.

We collect only the information necessary to fulfill legal requirements and to effectively manage your account or meet your financial needs. We do not collect any health or medical information (such as medical records or health conditions) in connection with our investment advisory services, and we do not wish to receive any protected health information governed by HIPAA. If we ever need personal health details for a specific financial service, that information will be handled in compliance with applicable health privacy laws and kept separate from your investment advisory records.

How We Use Your Information

We use a client's non-public personal information we collect for the following purposes:

We use the personal information we collect for everyday business purposes in providing investment advisory and financial planning services to you. This includes, for example:

- **To serve your accounts:** We use your information to assist you in opening accounts, manage your portfolio, execute transactions you request or authorize, provide financial advice, and communicate with you about your accounts and financial plans.
- **To operate our business:** This may include maintaining internal records, auditing and compliance checks, risk management, billing, and payment processing.
- **To offer services to you:** We may use your contact and profile information to inform you about relevant financial products or services offered by Sequent Planning that may suit your needs. We may also invite you to client events or send newsletters or educational materials. You have the option to opt out of receiving marketing communications, as described in the "Your Choices" section.
- **To fulfill legal and regulatory requirements:** We may use and retain your information as needed to comply with laws and regulations (for example, verifying your identity to prevent fraud or money laundering, satisfying SEC recordkeeping rules, or responding to court orders, regulatory inquiries, or tax reporting obligations).

We will not use your personal information for any purpose that is incompatible with the purposes outlined in this Policy or that is not permitted by law. We do not sell your personal information to third parties for monetary gain. We also do not share your information for cross-context behavioral advertising purposes (as "sharing" is defined under California law).

How We Share Your Information

We understand that protecting your information is vital. We do not disclose your non-public personal information to anyone except as permitted or required by law, or as authorized by you. Below, we list the typical circumstances under which we may share your information:

- **For everyday business purposes (Permitted by Law):** We share your information with our employees, investment adviser representatives and other supervised persons who need the information to perform their duties and provide services to you. We may share necessary information with non-affiliated third parties who help us process transactions, maintain your accounts, or otherwise provide services on our behalf. For example, we share information with custodians who hold your assets, brokers or fund companies to execute trades, banks to process transfers, technology vendors to service your account, or printing/mail vendors to send statements. We also may share information as needed to protect the security of your accounts or as part of routine business operations (such as with our attorneys, auditors, or consultants). In addition, we will disclose information if required by law – for instance, to comply with subpoenas, court orders, regulatory examinations, or to report to credit bureaus or government agencies. In these cases, we share only what is necessary and only with parties obligated to keep your information confidential and use it only for the specific purpose.
- **Within our corporate family (Affiliates):** Sequent Planning is affiliated with certain companies under common ownership. Our parent company, Senior Marketing Sales, is an insurance brokerage firm. We may share information about your transactions and experiences with our parent and affiliates for everyday business purposes and as needed to service your accounts. For example, if you have an insurance policy through an affiliate, we might share basic account status or contact information to coordinate service. **We do not share your creditworthiness or financial background information with our affiliates for their own use without giving**

you an opportunity to limit that sharing (see “Your Choices” below). And we do not allow our affiliates to use your information for marketing their products to you unless we have given you notice and, if required, obtained your consent.

- **For our own marketing:** We may use your information to market our services to you, such as by sending newsletters or information about new investment advisory services or financial planning strategies offered by Sequent Planning. This is done directly by us; we do **not** disclose your information to outside companies for them to market their services to you, except as described under joint marketing or with your consent in special cases.
- **With non-affiliated, third-party entities owned, controlled or affiliated with our representatives** (with your consent): In certain situations, your investment adviser representative (IAR) may also act as your insurance agent through a separately owned or controlled insurance agency or other entity which is not affiliated with Sequent Planning. If you maintain or seek insurance products (such as life, health, long-term care, or annuities) through that agent or their agency, we may share your information with that non-affiliated insurance entity, *only if you explicitly authorize us to do so*. This sharing would typically include relevant contact, and financial information needed for the insurance agent to market or service insurance products for you as part of your overall financial plan. We will not share any information with such non-affiliated, third-party entities without your *opt-in* consent, which we document via a Client Opt-In Authorization Form. Likewise, if your insurance agent (in their separate capacity) already has information about you that would be useful for your investment advisory relationship with us, they will share that information back with Sequent Planning *only if you authorize them* via a Client Information Sharing Authorization Form. These mutual information-sharing arrangements are ongoing and meant to facilitate coordinated service between your investment and insurance needs, always subject to your control.
- **Understanding our relationship with these non-affiliated, third-party entities owned, controlled or related to our IAR:** While your IAR and the insurance agent may be the same individual, the insurance agency or other entity through which they operate for insurance purposes is independent from Sequent Planning’s control and oversight (i.e., it is not an affiliate of Sequent Planning). Sequent Planning does not control, manage or otherwise supervise the privacy practices of those outside insurance businesses. Any information we share with them (with your consent) will be governed by their own privacy policies and applicable insurance privacy laws. We require your explicit permission precisely because we want you to be aware of and agree to this information sharing. Importantly, any data sharing with your insurance agent’s outside business will exclude health or medical information protected under HIPAA – we will *never* share your medical/health records or similar protected data. The purpose of allowing such sharing (if you consent) is to enhance the quality of service you receive – for example, enabling your advisor/agent to have a complete financial picture, to offer appropriate insurance products, and to service those products over time. If you do not opt in, we will not disclose your information to your advisor’s outside insurance entity, and you would need to provide any necessary information separately to each party.

Aside from the situations described above, we do *not* share your non-public personal information with non-affiliated companies for them to market to you. In other words, we do not sell or rent your personal data to third-party marketers. All information sharing is done either to service your accounts, to comply with the law, within our corporate family, or with your express consent for specific partner relationships (such as with your insurance agent). Furthermore, we do not share any health or medical information that may be protected by the Health Insurance Portability and Accountability Act (HIPAA).

How We Protect Your Information

Protecting the confidentiality and security of your information is a top priority for us. We maintain physical, electronic, and procedural safeguards in line with federal and state standards to guard your NPI:

- Internally, we restrict access to your personal information to those employees, independent contractor investment adviser representatives, other supervised persons or service providers who need to know the information in order to perform their duties and provide services to you. Each of these parties is trained on the importance of confidentiality and is bound by strict policies (and often confidentiality agreements) to protect your data.
- We employ secure technologies to protect our systems: this includes computer safeguards such as firewalls, data encryption, and secure authentication procedures to prevent unauthorized access to our networks and databases. Our websites and electronic communications are secured via encryption (e.g., HTTPS and other industry standards) when you interact with us online.
- Our offices and files are secured: we use locked file cabinets or secure document storage for paper records containing NPI, and our facilities have access controls. We dispose of documents containing sensitive information via secure shredding or destruction methods.
- We have an internal Written Information Security Program and policies addressing data protection, and we periodically review and update our security measures to adapt to evolving threats. In the event of a security breach that compromises your personal information, we will notify you and the appropriate authorities as required by law.
- Sequent Planning also requires any third-party service providers with whom we share information for business purposes to implement security measures that protect your data. For example, our data processing vendors and custodians must agree to confidentiality restrictions and cybersecurity standards in line with regulatory requirements.

Despite our rigorous safeguards, please understand that no system can be 100% secure. We encourage you to also do your part in protecting your information – for instance, safeguard your account statements, do not share your passwords, and notify us immediately if you suspect any unauthorized activity or if your personal information (such as Social Security number or account details) has been compromised.

Your Choices and Rights Regarding Your Information

We respect your privacy choices. Federal law gives you the right to limit certain types of information sharing. State laws, such as California's privacy laws, may provide additional rights. Below, we explain how you can exercise those choices:

1. Limiting Sharing with Affiliates and Non-Affiliates (Opt-Out and Opt-In): By law, you are entitled to opt out of some sharing of your NPI. Sequent Planning will **not** share the following categories of information without your permission:

- **Non-affiliates marketing to you:** We will not share your NPI with non-affiliated third parties for them to contact you about their own products and services, unless you affirmatively **opt in** and authorize such sharing. (As noted above, the primary instance of this would be sharing with a non-affiliated, third-party entity owned, controlled or related to your insurance agent for marketing or servicing insurance, which we only do if you sign a consent form.) If you do not opt in, we simply will not share your information with those parties.

Affiliates using information for marketing: For marketing purposes involving our affiliates including our parent company, Senior Market Sales, Inc. ("SMS"), we will share (unless a client affirmatively opt-out of such sharing) a client's non-public personal information for marketing other services such as insurance and/or annuities. A client should notify us immediately at our address, email or telephone number listed below if a client chooses to opt out of our sharing client's non-public personal information with our affiliates.

- **Sharing of certain information with affiliates:** Federal law allows you to opt out of sharing “information about your creditworthiness” with our affiliates for their own use. Sequent Planning does not obtain consumer credit reports or similar creditworthiness data in the normal course of our advisory services. Any financial information we might share with affiliates is related to your transactions or experiences (which federal law does not require an opt-out for). If that policy changes, we will notify you and give you an opt-out choice.

If you are a new client, we can begin sharing your information (in the limited ways we do) from the day you sign our investment advisory agreement or otherwise establish a relationship. If you decide to opt out of any permissible sharing, we will honor that choice as soon as we receive and process your request. For an existing client, your opt-out instruction will apply going forward. And if you are no longer our client, we may continue to maintain and share your information only as described in this Policy (for example, to comply with laws or as part of ongoing obligations), but you still retain the ability to opt out of allowable sharing at any time.

In addition, residents of certain states have opt-out and opt-in rights under state law, which we discuss in the next section. In some cases, these state rights may overlap with the choices described above. We will always strive to honor the strictest applicable choice you have made, whether under federal or state law. For example, if you are a California client and state law requires your opt-in consent for a particular data sharing, we will treat that as required even if federal law might allow an opt-out.

2. Additional Privacy Rights Under State Laws: In addition to the privacy rights under GLBA and Regulation S-P, you may have certain rights under a state data protection law (depending upon your state) regarding your personal information. These rights (described below) apply in addition to your opt-out choices above, and in some cases may not apply to information already protected under GLBA. However, Sequent Planning’s policy is to be transparent and accommodative of privacy rights, so we include them here for completeness:

- **Right to Know/Access:** You have the right to request that we disclose the personal information we have collected about you in the past 12 months, including the categories of information, the sources of that information, the business purposes for collection, and the categories of third parties with whom we have shared or disclosed the information. You also have the right to request a copy of the specific pieces of personal information we have collected about you. Upon verifiable request, and as required by law, we will provide this information to you in a readily usable format, free of charge. (Please note that in many cases, because of the GLBA exemption, the information we hold as part of providing financial services may not be subject to the state data protection law’s access requirements. If that is the case, we will let you know. Nonetheless, we aim to provide you with as much information as we are lawfully able to.)
- **Right to Delete:** You have the right to request that we delete personal information we have collected from you. Once we receive a verified deletion request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exemption applies. Important exceptions will likely apply in a financial services context: for example, we cannot delete information that we are required to retain to comply with laws or regulations (such as SEC record retention rules), to complete transactions or services you have requested, to detect security incidents or protect against illegal or fraudulent activity, or to exercise or defend legal claims. If we must retain certain data for legal reasons, we will inform you of that in our response and will delete all other information that is not exempt. We will not use any retained data for any purpose other than the exempt reason.
- **Right to Correct:** If you believe that any personal information that we maintain about you is inaccurate or incomplete, you have the right to request that we correct that information. Upon verification and consideration of the request, we will correct the information as you direct, or if we dispute the accuracy, we will let you know why we cannot make the change and keep a note of your requested correction. (For example, if a record we

received from a third-party contains an error, we may need to verify which information is correct before updating.)

- **Right to Opt-Out of Sale or Sharing:** The right to opt out of the “sale” of your personal information, or the “sharing” of your personal information for cross-context behavioral advertising. Sequent Planning does not sell your personal information to third parties for money. We also do not engage in sharing your information for behavioral advertising (we do not provide your data to advertising networks or data brokers for targeted ads). The limited sharing we conduct (with service providers or, with your consent, with your insurance agent) is either strictly for business purposes or at your direction. In any event, if you have concerns or wish to instruct us not to disclose your information beyond what is necessary for services, please contact us – we will gladly honor any request to limit data use to the extent possible.
- **Right to Limit Use of Sensitive Personal Information:** In some cases, you may direct a business to limit the use of “sensitive personal information” (such as Social Security numbers, financial account log-in credentials, precise geolocation, etc.) to only that which is necessary to provide services. Sequent Planning already **limits the use of sensitive data to the essential purposes** for which it was provided (for example, we use your Social Security number only for required tax reporting, identity verification, or account opening – we do not use it to profile you or for secondary purposes). We do not use or disclose sensitive personal information except as needed to service your account, to prevent fraud or legal violations, or as otherwise permitted by law (which are considered “necessary” purposes) or expressly authorized by you. Thus, your sensitive data is automatically handled in a limited, protected way. If you still wish to request that we further limit any use of your sensitive information, you may contact us and we will accommodate your request to the extent feasible.
- **Right to Non-Discrimination:** We will never discriminate or retaliate against you for exercising any of your privacy rights. This means we will not deny you services, charge you a different price, or provide a different level of service just because you exercised your rights under a state data protection law. Your relationship with us remains the same regardless of your privacy preferences. (However, please note that if you do ask us to delete or restrict information, it could affect our ability to continue providing the full scope of services – for instance, we may not be able to make certain recommendations without necessary data. In such cases, we will inform you if a request could impact service, but we will not terminate or degrade your service just because of the request.)

How to Opt Out or Limit Sharing: You can notify us of your desire to opt out of any sharing described above at any time. To do so, please contact us by phone at **1-866-241-0645** or email us at operations@sequentplanning.com with your request. You may also send a written request to our mailing address (Sequent Planning, LLC – Operations 8420 W. Dodge RD. STE 110 Omaha, NE. 68114) indicating which sharing practices you want to opt out of. There is no charge for opting out. We will confirm your request and ensure your preferences are honored. (Please note that you cannot opt out of certain necessary sharing, such as for everyday business operations, or sharing mandated by law.)

For your security, we will need to verify your identity (or authority, if an agent makes the request) before processing certain requests, particularly for access, deletion, or correction of specific pieces of information. We may ask you to confirm personal details we have on file or use other verification procedures as allowed by law. We will respond to your request within the time frames required by law (generally within 45 days, with the possibility of a 45-day extension if necessary, which we will communicate to you). There is no fee for making a request.

Opt-In for Non-Affiliate Marketing

Your Choices

As a client of Sequent Planning, you have the right to:

- *Opt-out of marketing communications:* You may choose to opt-out of receiving marketing communications from us or affiliates at any time.
- *Access and review your information:* You can request access to review the non-public personal information we have collected about you.
- *Correct inaccuracies:* If you believe any of your personal information is inaccurate or incomplete, you may request corrections.
- *Withdraw consent:* You may withdraw your consent for the use and sharing of your non-public personal information at any time, subject to legal or contractual obligations.

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Updates to the Client Privacy Policy

Sequent Planning reserves the right to update this Client Privacy Policy as needed to reflect changes in our practices or applicable laws and regulations. We will notify you of any material changes, and the updated policy will be posted on our website at www.sequentplanning.com.

Conclusion

At Sequent Planning, we are committed to protecting the privacy of our clients and complying with all relevant privacy regulations. This Client Privacy Policy ensures transparency in our data practices and helps you make informed decisions about the use and sharing of your non-public personal information. We appreciate your trust in our firm and assure you that your privacy is our top priority.

Definitions

Affiliates – Companies related by common ownership or control; they can be financial and nonfinancial companies.

Non-affiliates – Companies not related by common ownership or control of Sequent Planning; they can be financial and nonfinancial companies including but not limited to insurance agencies owned and operated in a separate capacity by our independent contractor investment adviser representatives.

Joint marketing – A formal agreement between non-affiliated financial companies that together market financial products or services to our client.