

IMS Capital Management Privacy Policy

Your relationship with IMS Capital Management is based on trust and confidence. To fulfill its responsibilities to you, IMS Capital Management depends on you for current and accurate financial and personal information. You deserve and expect that IMS Capital Management will protect the information you have provided in a manner that is safe, secure and professional. IMS Capital Management and its employees are committed to protecting your privacy and to safeguarding your information.

Safeguarding Customer Documents

During regular business hours access to customer records is monitored so that only those with approval may access the files. During hours in which the company is not in operation, the offices are locked.

No unauthorized person shall obtain personal and financial customer information. No authorized individual shall share that information in any manner without the specific consent of a firm principal. Failure to observe IMS Capital Management procedures regarding customer and consumer privacy will result in discipline and may lead to termination.

Sharing Nonpublic Personal and Financial Information

IMS Capital Management is committed to the protection and privacy of its customers and consumers personal and financial information. IMS Capital Management will not share such information with any nonaffiliated third party except:

- When necessary to complete a transaction in the account, such as with the clearing firm or account custodians
- When required to maintain or service the account
- To resolve customer disputes
- When requested by a fiduciary or beneficiary on the account
- To rating agencies rating, or to the client's attorneys or accountants
- When required by a regulatory agency, or for other reasons required or permitted by law
- In connection with a sale or merger of IMS Capital Management business
- In any circumstance that has the customer's instruction or consent.

Opt-Out Provisions

It is not a policy of IMS Capital Management to share nonpublic personal and financial information with unaffiliated third parties except under the circumstances noted above. Since sharing under the circumstances noted is necessary to service the client account or mandated by competent authority there are no allowances made for clients to opt out.