



CUSTOMER INFORMATION LETTER

Privacy Policy and Business Continuity Plan Disclosure

July 2009

PRIVACY POLICY

At JSK Associates Inc ("JSK"), we are committed to protecting your privacy and the confidentiality of your personal and financial information. Pursuant to the requirements of the Gramm 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 nonpublic 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. The sharing of your information among our affiliate enables us to serve you more efficiently and makes it more convenient for you to do business with us. We are permitted by law to share information with our affiliate about your account history and your experiences with us. Our affiliate, IES, follows the same privacy policies.

Scope of Policy

This Privacy Policy covers the practices of the Company and applies to all nonpublic 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") 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.

Persons Covered by the Privacy Policy

The JSK Privacy Policy applies to anyone who is a current or former 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 sharing of information, we will notify you in advance and give you the opportunity to "opt out" of such disclosure.

How We Obtain 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: applications and other forms you file with us (e.g., name, assets, and income), records of transactions with us, our affiliates, and non-affiliated third parties (e.g., Southwest 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.

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.

We Protect Confidentiality

JSK uses 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.

Safeguarding Of Client Records and Information

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

Safeguard Monies in Your Account

In light of increased concern about identity theft, we want to convey the safeguards that limit the ways funds can be withdrawn from your brokerage account. (1) We only accept requests to disburse monies from the account owner, trustee, trust administrators, or users with written authorization prior to the disbursement request. (2) Monies disbursed by check may only be sent to the account holder at the address of record. (3) Monies disbursed by electronic wire or ACH (Automated Clearing House, which is a free two-day wire) are sent directly to the account holder's designated checking account. (4) We do not forward checks, wire, ACH to a third-party.

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

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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.

When you access your account online, it is through a Secure Socket Layer-encrypted session between your browser and through Southwest Securities servers. To ensure the highest level of security, SWST has installed VeriSign Global Server IDs on each server. SWST 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.

JSK and IES employees 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. We instruct our employees to use strict standards of care in handling the personal, confidential information of customers and remind them on a regular basis of their obligations with regard to the confidentiality of customer information.

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.

BUSINESS CONTINUITY PLANNING

Our business continuity planning (“BCP”) first ensures the safety and security of our employees. 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

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customers. In addition to protecting our personnel, our BCP and daily operations are focused on preserving our critical firm and customer data through monthly backups which are moved offsite via electronic copies of our data at 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 number (845) 878-2223. If you cannot access us through either of those means, you should contact our clearing firm, Southwest Securities Inc (“SWS”) at (214) 859-1800 and at <https://myview.SWST.com/inteq> for prompt access to your account.

Our Business Continuity Plan

We plan to quickly recover and resume business operations after a significant business disruption and respond by safeguarding our employees 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 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 backup and recovery; all mission critical systems; financial and operational assessments; alternative communications with customers, employees, and regulators; alternate physical location of employees; critical supplier, contractor, bank and counterparty 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, SWS, 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 number, (845) 878-2223 and give you

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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 Southwest Securities.

For more information and if you have questions about our business continuity planning, you can contact us at group@investtowin.com or JSK, 120 Bloomingdale Road, Suite 3400, White Plains, NY 10605.

If you have questions or concerns, please contact us at (800) 259-7130.

JSK ASSOCIATES INC
120 Bloomingdale Road, Suite 3400
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Southwest Securities Business Continuity Plan is available at www.southwestsecurities.com/pdf/bcbp.pdf

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