

# Fortune 45, LLC

39309 Tommy Moore Rd. Gonzales, Louisiana 70737

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## PRIVACY POLICY

Investment advisers are required by law to inform their clients of their policies regarding privacy of client information. We are bound by professional standards of confidentiality that are even more stringent than those required by law. Federal law gives Fortune 45 the right to limit some but not all sharing of personal information. It also requires us to tell you how we collect, share, and protect your personal information.

### TYPES OF NONPUBLIC PERSONAL INFORMATION (NPI) WE COLLECT

We collect nonpublic personal information about you that is either provided to us by you or obtained by us with your authorization. This can include but is not limited to your Social Security Number, Date of Birth, Banking Information and Financial Account Numbers and/or Balances, Sources of Income, Credit Card Numbers or Information. When you are no longer our customer, we may continue to share your information only as described in this notice.

We collect information about your visits to our website. We store records of the activities on our sites in our web server logs, which automatically capture and save the information electronically. The information we collect helps us administer the site, analyze its usage, protect the website and its content from inappropriate use, and improve the user's experience.

### CATEGORIES OF INFORMATION WE DISCLOSE

We may only disclose information that we collect in accordance with this policy. We do not sell customer lists and will not sell your name to telemarketers.

### PARTIES TO WHOM WE DISCLOSE INFORMATION

All Investment Advisers may need to share personal information to run their everyday business. In the section below, we list the reasons that we may share your personal information:

- For everyday business purposes – such as to process your transactions, maintain your account(s), or respond to court orders and legal investigations, or report to credit bureaus;

- For our marketing – to offer our products and services to you;
- For Joint marketing with other financial companies;
- For our affiliates' everyday business purposes – information about your transactions and experiences; or
- For non-affiliates to market to you.

Clients may opt out of sharing information for joint marketing to other financial companies, to our affiliates and to non-affiliates. If you are a new customer, we may begin sharing your information on the day you sign our agreement. When you are no longer our customer, we may continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.

### PROTECTING THE CONFIDENTIALITY OF CURRENT AND FORMER CLIENT'S INFORMATION

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law, including computer safeguards and secured files and building.

### FEDERAL LAW GIVES YOU THE RIGHT TO LIMIT SHARING – OPTING OUT

Federal law allows you the right to limit the sharing of your NPI by "opting-out" of the following: sharing for affiliates' everyday business purposes – information about your creditworthiness; sharing with affiliates who use your information to market to you; or sharing with non-affiliates to market to you. State laws and individual companies may give you additional rights to limit sharing. Please notify us immediately if you choose to opt out of these types of sharing.

### REGULATION S-AM

Under Regulation S-AM, a registered investment adviser is prohibited from using eligibility information that it receives

from an affiliate to make a marketing solicitation unless: (1) the potential marketing use of that information has been clearly, conspicuously and concisely disclosed to the consumer; (2) the consumer has been provided a reasonable opportunity and a simple method to opt out of receiving the marketing solicitations; and (3) the consumer has not opted out.

#### **REGULATION S-ID**

Regulation S-ID requires our firm to have an Identity Theft Protection Program (ITPP) that controls reasonably foreseeable risks to customers or to the safety and soundness of our firm from identity theft. We have developed an ITPP to adequately identify and detect potential red-flags to prevent and mitigate identity theft.

#### **OUR SECURITY POLICY**

We restrict access to nonpublic personal information about you to those individuals who need to know that information to provide products or services to you and perform their respective duties. We maintain physical, electronic, and procedural security measures to safeguard confidential client information.

#### **CYBER SECURITY**

Internal policies and procedures are in place to address cyber security. A copy of this policy is available upon request.

#### **SUCCESSION PLANNING**

In the event that the owner(s) retire, become incapacitated, or perish unexpectedly, your information would be disclosed to

***Please call 225-614-9599 if you have any questions. Your privacy, our professional ethics, and the ability to provide you with quality financial services are very important to us.***

an unaffiliated third party for the purposes of facilitating a business succession plan. A change in control of ownership would require your consent, as dictated by your signed agreement with our firm, in order to continue providing services to you.

#### **CLOSED OR INACTIVE ACCOUNTS**

If you decide to close your account(s) or become an inactive customer, our Privacy Policy will continue to apply to you.

#### **COMPLAINT NOTIFICATION**

Please direct complaints to: Jesse Rodrigue at Fortune 45, LLC, 39309 Tommy Moore Rd. Gonzales, Louisiana 70737; (225) 614-9599.

#### **CHANGES TO THIS PRIVACY POLICY**

If we make any substantial changes in the way we use or disseminate confidential information, we will notify you. If you have any questions concerning this Privacy Policy, please contact us at: Fortune 45, LLC, 39309 Tommy Moore Rd. Gonzales, Louisiana 70737; (225) 614-9599.

**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. They can be financial and nonfinancial companies; Joint marketing – a formal agreement between non-affiliated financial companies that together market financial products or services to you.

