



Privacy Policy 2019 Annual Notice

The Securities and Exchange Commission, Regulation S-P 17 CFR Part 248.5, requires InTrack Investment Management (InTrack) to annually present their clients with our Privacy Policy and to notify clients that they are able to change their personal identification information (PINS) on accounts accessed through InTrack's web site, www.intrackinvest.com.

It is important that clients safeguard their personal information by taking a few simple precautions:

- For all internet sites requiring PINS, it is recommended that user names and passwords be changed periodically to protect personal information from being compromised;
- Passwords contain alphanumeric, upper and lower-case letters and special characters;
- Protect account, PIN, and access numbers;
- Never disclose confidential information to unknown callers;
- When using the internet be sure to use a secure browser;
- Keep virus detection software up to date;
- Never open e-mail from unknown sources.

On November 12, 1999, President Clinton signed the Gramm-Leach-Bliley Act into law. Subtitle A of Title V of the Act, "Disclosure of Nonpublic Personal Information," limits the instances in which financial institutions may disclose nonpublic personal information about a consumer to nonaffiliated third parties. The act requires a financial institution to disclose to clients the institution's privacy policies and practices with respect to information sharing with both affiliates and nonaffiliated third parties. The document can be accessed at www.sec.gov.

InTrack Investment Management, Inc. acknowledges our obligation to respect and protect the privacy of our clients and prospective clients and the security and confidentiality of client nonpublic, personal information.

Nonpublic personal information may be collected from the following sources:

- Client interactions with our firm including, but not limited to, face to face or phone discussions, e-mail or mail correspondence, interactive tools via our web site and forms provided by InTrack to obtain information on risk and objectives;

- From third parties, with the client or a representative of the client's consent, for example institutions processing the transfer of brokerage accounts;
- With the client's permission, the client's team of professional service providers, i.e. an attorney;
- Client's transactions and account balances, realized and unrealized gains and losses, interest and dividends credited to the client's accounts.

InTrack restricts access to client nonpublic information except for the following instances:

- When information is necessary to provide the client with services or products they requested;
- To complete applications when opening brokerage accounts, offering, developing and delivering products or services and completing transactions for the client;
- With the client's approval, to a professional service provider retained by the client, i.e. an accountant;
- Unaffiliated service providers, i.e. Chicago Clearing Corporation (Class Action Lawsuits);
- Organizations that may need information to prevent fraud;
- To respond to legal and regulatory requirements;
- By mandate of government or law enforcement agencies (tax reporting under a court order).

Other information

- Information the client provides to us is only used for the stated purpose;
- E-mail sent to InTrack from a client is kept on file, printed or stored depending upon SEC requirements.;
- A client may request InTrack to keep information sent to us for future use;
- InTrack will not share client e-mail addresses with anyone outside of our firm unless the client grants InTrack permission to do so;
- InTrack does not collect technical or navigational information as a firm;
- InTrack safeguards the nonpublic information through physical, electronic and procedural safeguards and in compliance with SEC regulations.

InTrack Investment Management's Privacy Policy is read by all InTrack employees and management will make reasonable efforts to review this policy on an ongoing basis to ensure that it is followed. Any misuse of this information by an employee will be considered a violation of this policy and the employee will face disciplinary action. If any violation to this policy occurs, the violation should be reported to management immediately.

If you have any questions regarding this document, please contact us by e-mail at msopher@intrackinvest.com or jan@intrackinvest.com, by phone, (802) 658-0525 or (802) 649-1666, through our web site: www.intrackinvest.com, or by mail:

InTrack Investment Management, Inc.
1233 Shelburne Road, Suite D6B
South Burlington, Vermont 05403