

PRIVACY POLICY

FACTS	WHAT DOES FOUNTAIN STRATEGIES, LLC DO WITH YOUR PERSONAL INFORMATION?
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Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
What?	<p>The types of personal information we collect and share depend on the product or service you have with us. This can include:</p> <ul style="list-style-type: none"> • Social Security Number • Income • Investment experience • Risk tolerance • Retirement assets • Wire transfer instructions <p>When you are no longer our customer, we do not continue to share your information as described in this notice.</p>
How?	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Fountain Strategies, LLC chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Fountain Strategies, LLC share?
For our everyday business purposes- such as to process your transactions, maintain your account(s), respond to court orders and legal investigations.	Yes
For our marketing purposes- to offer our products and services to you.	No
For joint marketing with other financial companies	No
For our affiliates everyday business purposes- information about your creditworthiness.	No
For non affiliates to market to you	No

Questions

Call (831) 298-7036, collect if it is a toll call

What we do

<p>How does Fountain Strategies, LLC protect my personal information?</p>	<p>To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.</p>
<p>How does Fountain Strategies, LLC collect my personal information?</p>	<p>We collect your personal information, for example</p> <ul style="list-style-type: none"> • Enter into an investment advisory agreement • When you open an account • Seek financial or tax advice • Seek advice about your investments • Tell us about your investment or retirement portfolio • Make deposits or withdrawals from your account
<p>Why can't I limit all sharing?</p>	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> • Sharing for affiliates' everyday business – information about your creditworthiness. • Affiliates from using your information to market to you. • Sharing for non-affiliates to market to you. <p>State laws and individual companies may give you additional rights to limit sharing.</p> <ul style="list-style-type: none"> • California regulations require an affirmative opt-in before information can be shared with non-affiliated third parties; an opt-out for sharing amongst affiliates; and a self-addressed envelope with pre-paid postage if there is not at least two free ways to respond (e.g. toll free telephone or website).
<h2>Definitions</h2>	
<p>Affiliates</p>	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> • Fountain Strategies, LLC has no affiliates
<p>Non-affiliates</p>	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> • Fountain Strategies, LLC does not share with nonaffiliates so they can market to you.
<p>Joint marketing</p>	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> • Fountain Strategies, LLC doesn't jointly market.



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We are required to deliver this Privacy Policy statement to you annually in writing. Although we would like to state categorically that your non-public information and data will go no further than our offices, it is more accurate to tell you how such information may be shared.

Fountain Strategies, LLC has four Investment Advisor Representatives (“Advisors”): Douglas M. Pease, Austin W. Chinn, Manorama K. Pai and Douglas M. Roeser. Files containing your non-public information are stored in your Advisor’s computer and paper files, copies of which, including scanned copies of paper files, are transferred periodically from Advisor computers to the firm’s server located at the principal executive address of the firm, 938 W. Carmel Valley Road, Carmel Valley, CA. We believe the firm’s server files are accessible only to Advisors, with the exception of occasional sessions by our IT maintenance person. Our firm has no other staff. Advisor computers and the firm’s server are linked through Microsoft Exchange by a Virtual Private Network, and we believe all channels are protected from outside invasion by commercially available security software including encryption, firewall and anti-virus protection.

Personnel at Fidelity Investments or at any other firm that custodies and brokers your investment account(s) will have access to your personal history and to investment account data sufficient and necessary for them to provide their services.

We engage BridgePortfolio, Inc. (BP) to track and post online daily values and monthly performance of the assets we manage. Advisors can access all client account data on the site, and clients can access only their own account data with personal ID and password. BP accesses the same daily account data link from Fidelity that feeds Fountain Strategies’ server. Actual entries and postings to the BP site are made by a team at Advent, in San Francisco. In addition to the Fidelity data link, BP accesses many client accounts not custodied at Fidelity via By All Accounts, which affords BP an owner’s view of data in those accounts.

We engage MoneyGuidePro (MGP) to post client financial planning data online, accessible to Advisors and to clients only by individual ID and password. Investment data in MGP is updated via a link to BP, exercised only by Advisors.

Each of the entities named above strives to protect data privacy, security and integrity, motivated both by compliance regulation, by oversight agencies, and by knowing that any breach of privacy threatens their company’s survivability.

On occasion we may be required by law to share your data; specifically, we will be required to open client files at random to federal and state regulators during periodic compliance audits.

Probably the most vulnerable link in the chain of data protection is email. Email traffic is open and available to the digital information world. Even though we transmit any non-public data in password-protected email attachments, you are hereby advised that Fountain Strategies, LLC cannot guarantee that the use of email, either by the firm or by you, will be completely secure. If you prefer that an Advisor not use email to communicate with you, please notify us in writing and we will use regular mail instead.

Fountain Strategies, LLC by Douglas M. Pease, CFP
18 December 2009 at Carmel Valley, California