



Independent Financial Advisors  
Michael S. Miles, CFP, REBC, MBA, Principal Advisor



## **Notice of Privacy Policy**

### **1. What is the purpose of this Notice of Privacy Policy?**

Variplan, LLC ("Variplan") is an investment adviser registered under the Investment Advisers Act of 1940, as amended, (the "Advisers Act"). Variplan has adopted the following policies and procedures in order to comply with the Securities Exchange Commission's (SEC) Privacy of Consumer Financial Information rule (commonly known as "Regulation S-P").

More specifically, we want you to know what type of information we collect about you and how we use that information.

### **2. What information do we collect about you?**

We collect the following types of nonpublic personal information about you:

- Information we receive from you on your application for advisory services and related forms.
- Information about your advisory services and brokerage transactions with us, our affiliates and third parties not affiliated with us that are used by us to provide our advisory services to you.

### **3. To whom do we disclose your nonpublic personal information?**

We disclose your nonpublic personal information to only the following persons:

- The companies you authorize us to use to provide advisory services to you, for example, the custodian for your account.
- The companies we use to carry out the services you authorize us to provide, for example, brokers, our accountants, lawyers and the like.

### **4. What information do we disclose about you to these parties?**

We may disclose the following kinds of nonpublic personal information about you:

- Information we receive on your application for services or client questionnaire, such as, your name, social security number, assets, and income.
- Information about the transactions in your account.

### **5. How do we safeguard your nonpublic personal information?**

We restrict access to nonpublic personal information about you to those employees and service providers (like brokers and custodians) who need to know that information in order for us to carry out the advisory services that you have asked us to provide you. We maintain physical, electronic, and procedural safeguards that comply with federal standards to guard your nonpublic personal information.

### **6. To whom do I direct my questions about this Notice of Privacy Policy?**

Questions about Variplan's Notice of Privacy Policy should be directed to Michael S. Miles, our acting Compliance Officer who can be reached at: 800-923-5561.