

## **Item 1 Cover Page**

# **Plan Confidence Corporation**

IARD # 283781

**March 23, 2017**

Kevin T. Clark, RFT™ President and Chief Compliance Officer  
Plan Confidence Corporation

Home Office Address:  
1740 Alderman Street, Unit 6,  
Sarasota, FL 34236

Phone Numbers: 312-373-0772

E-mail: [support@planconfidence.com](mailto:support@planconfidence.com)

Website: [www.planconfidence.com](http://www.planconfidence.com)

This brochure provides information about the qualifications and business practices of Plan Confidence Corporation. If you have any questions about the contents of this brochure, please contact us by phone at 312-373-0772 or e-mail at [support@planconfidence.com](mailto:support@planconfidence.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC"), or by any state securities authority.

"Registration does not imply a certain level of skill or training."

Additional information about PlanConfidence Corporation also is available on the SEC's website at: [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Item 2 Material Changes**

Plan Confidence Corporation's (PLAN CONFIDENCE CORPORATION) initial Form ADV Part 2A Disclosure Brochure registration became effective on May 16, 2016.

Since our initial registration filing we have made the following two material changes:

- Our Home Office is now located at: 1740 Alderman Street, Unit 6, Sarasota, FL 34236
- PLAN CONFIDENCE CORPORATION may compensate Solicitors for referring investment advisory clients to PLAN CONFIDENCE CORPORATION. See Item 14, on page 8.

For a complete review of Plan Confidence Corporation's services, activities and disclosures please review the following Form ADV Part 2A Disclosure Brochure content.

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#### **Item 4 Advisory Business**

PLAN CONFIDENCE CORPORATION's has been an "internet only" investment adviser registered with the United States Securities and Exchange Commission ("SEC") since May 2016. PLAN CONFIDENCE CORPORATION is notice filed in the state of Florida and in other states as required by state rules and regulations. PLAN CONFIDENCE CORPORATION is a Corporation and was incorporated in the state of Delaware in 2016. Kevin T. Clark, RF<sup>TM</sup>, is the President and Mark Reddark is the Chief Technology Officer of PLAN CONFIDENCE CORPORATION.

Under SEC Investment Advisers Act Rule 203A-2(e), an "internet only" investment adviser cannot have personnel elaborate or expand upon the investment advice provided by its interactive website. An "internet only" investment adviser cannot simply aggregate and provide financial information in response to user-provided requests that do not include personal information.

An "internet only" investment adviser's interactive website must provide advice through computer-based models or applications based on personal information supplied by the client.

#### **Plan Confidence<sup>TM</sup>**

Plan Confidence<sup>TM</sup> is an online investment advice service created by PLAN CONFIDENCE CORPORATION. Plan Confidence<sup>TM</sup> allows Clients to receive illustrative asset allocation models that are available investment options within a Client's universe of investment options. Each Client will be provided an asset allocation model designed for a Client's unique risk profile. Client's risk profile is selected using multiple factors which include, but are not limited to, Client's age, assets outside of Client's universe of investment option, expected time to retire, selected Morningstar Categories, and risk tolerance.

Plan Confidence<sup>TM</sup> services do not analyze or recommend any individual securities, Target Date funds, Asset Allocation model portfolios or company stock investment options.

PLAN CONFIDENCE CORPORATION utilizes the online software services of Reddark Technologies, Inc. (Reddark) to provide Plan Confidence<sup>TM</sup> services to Clients.

Amazon Web Services (AWS), a comprehensive web services provider, is utilized by PLAN CONFIDENCE to provide Plan Confidence<sup>TM</sup> hosting services to Clients. AWS centralizes security to protect sensitive data and prevent data loss by hosting data in a cloud environment, not on individual devices, which reduces the risk of intrusion through insecure devices or network connections. The environment provided by AWS includes web servers, encrypted databases, secure document storage and daily database backups. Access to the PLAN CONFIDENCE AWS account is secured by limited functionality AWS accounts with strong passwords and multi-factor authentication as provided by AWS.

PLAN CONFIDENCE CORPORATION is not an Employee Retirement Income Security Act (ERISA) Section 3(38) Investment Manager Fiduciary that makes investment management decisions and has discretionary authority for Qualified Retirement Plan assets. However, PLAN CONFIDENCE CORPORATION may be deemed an ERISA Section 3(21) (a) (ii) Limited Services Fiduciary that only makes recommendations to Qualified Retirement Plans, Plan accounts and other qualified retirement accounts through the Plan Confidence<sup>TM</sup> services non-discretionary advice.

#### **Additional PLAN CONFIDENCE CORPORATION Advisory Service Disclosures**

PLAN CONFIDENCE CORPORATION does not participate in any wrap fee program as a portfolio manager.

PLAN CONFIDENCE CORPORATION does not manage client accounts or assets. PLAN CONFIDENCE CORPORATION does not have any discretionary authority over client accounts or assets.

## **Item 5 Fees and Compensation**

### **Plan Confidence™ Service Fee and Fee Authorization**

**Plan Confidence™ Service Fee** - \$25.00 per month, per account.

Fee Authorization- A recurring fee is paid in advance each month for **Plan Confidence™** services per each account reviewed by PLAN CONFIDENCE CORPORATION. Client authorizes the recurring monthly fee through Stripe, Inc. ("Stripe"), a third party online payment processor. Stripe developed a secure online payment service to accept credit and debit card payments from Clients. Stripe is not a bank, custodian or a money services business ("MSB"). Stripe does not offer banking, custodial or MSB services as defined by the United States Department of Treasury. In addition, Stripe does not assume any liability for Plan Confidence services purchased using Stripe's online payment service.

Plan Confidence™ Agreement Termination- Client may terminate Plan Confidence™ agreement and services by revoking their recurring monthly fee authorization through Stripe. Plan Confidence™ agreements may also be terminated by either party effective upon receipt of written or electronic notice to the other party. The fees for these services do not include payment for other professional services.

### **General Compensation Conflicts Compliance Oversight Policies**

**PLAN CONFIDENCE CORPORATION Obligations** – PLAN CONFIDENCE CORPORATION and its employee, associates and investment adviser representatives ("IAR") are subject to the following specific obligations when dealing with clients:

- The duty to have a reasonable, independent basis for its investment advice;
- The duty to ensure that investment advice is suitable to meeting the client's individual objectives, needs, and circumstances and a duty to be loyal to clients.

Kevin T. Clark, RFTM, the President and Chief Compliance Officer (CCO) of PLAN CONFIDENCE CORPORATION, is responsible for supervising PLAN CONFIDENCE CORPORATION's investment advisor services. The main reports and documents the CCO reviews to supervise/review these activities are Client Profiles and Morningstar Reports.

For further disclosure information on these other financial industry Activities and insurance referral activities please review **Item 10. Other Financial Industry Activities and Affiliations.**

## **Item 6 Performance Based Fees and Side-By-Side Management**

PLAN CONFIDENCE CORPORATION does not conduct any performance based fee advisory business or activities.

## **Item 7 Types of Clients**

PLAN CONFIDENCE CORPORATION generally provides investment advice to the following:

- Individuals
- Businesses and Business Owners
- Defined Contribution Plans (401k, 403b, 457, SIMPLE, etc.) and Plans Participants
- Other Retirement Plans and Plan Participants

**Plan Confidence™ Fee Minimum-** PLAN CONFIDENCE CORPORATION has a minimum fee for Plan Confidence™ services of \$25 per month per account.

## **Item 8 Methods of Analysis, Investment Strategies and Risk of Loss**

### **Methods of Analysis –**

Plan Confidence uses a proprietary scoring methodology created by Reddark Technologies, Inc. known as the “Reddark Score” to review the available investment options for each Client. The Client will then complete a questionnaire that reviews the risk tolerance, age, other available assets and other information necessary to be assigned to an **Asset Allocation Model**.

- A. Asset Allocation Model Selection** - is the implementation of an investment strategy that attempts to balance risk versus reward by adjusting the percentage of each asset in an investment portfolio according to the investor's risk tolerance, goals and investment time frame. The client will also state whether they prefer a **Strategic Asset Allocation – based on Modern Portfolio Theory**; or a **Tactical Asset Allocation – based on Momentum Investing**.

#### **I. Strategic Asset Allocation – based on Modern Portfolio Theory**

**Strategic Asset Allocation** - A portfolio strategy that involves setting target allocations for various asset classes, and periodically rebalancing the portfolio back to the original allocations when they deviate significantly from the initial settings due to differing returns from various assets.

**Modern Portfolio Theory** (MPT) is a mathematical framework for assembling a portfolio of assets such that the expected return is maximized for a given level of risk, defined as variance. Its key insight is that an asset's risk and return should not be assessed by itself, but by how it contributes to a portfolio's overall risk and return. The Strategic Asset Allocation Models will be reviewed monthly.

If the client chooses a strategic model, they will have the option of choosing which Morningstar Categories they prefer not to receive any recommendations on. Once this process has been completed, the appropriate asset allocation model will be “overlaid” over their available investment options and the final output will display the recommended percentage of each investment to use. Proxy investments will be assigned for any missing asset categories. The client will be notified when and why a proxy is being used in their recommendations.

- a. Five MPT Models
  - i. Income Only – 100% Fixed Income/Cash
  - ii. Conservative – 20% Equity & 80% Fixed Income/Cash
  - iii. Moderate – 50% Equity & 50% Fixed Income/Cash
  - iv. Balanced – 65% Equity & 35% Fixed Income/Cash
  - v. Aggressive – 100% Equity
- b. Two or more Institutional Firm Model Allocations are reviewed Quarterly (Mar, Jun, Sep & Dec)
  - i. All Morningstar “blend” categories are removed (only growth and value equity strategies will be used)
  - ii. A “consensus” or “average” of allocation categories created.

## II. Tactical Asset Allocation – based on Momentum Investing

**Tactical Asset Allocation** (TAA) is a dynamic investment strategy that actively adjusts a portfolio's asset allocation. The goal of a TAA strategy is to improve the risk-adjusted returns of passive management investing.

**Momentum Investing** is a system of buying securities that have had high returns over the past three to twelve months, and selling those that have had poor returns over the same period. The Tactical Asset Allocation Models will be reviewed daily.

- a. Only S&P 500 Category used for model
- b. S&P 500 index via [www.stockcharts.com](http://www.stockcharts.com)
- c. (If necessary) Model Change uploaded to go “live” the following trading day at 9am CDT.

**B. Investment Strategies for Future Dollars** (money that has not been added to the account yet). A **Dollar Cost Averaging Methodology** (DCA) will be used. DCA is the technique of buying a fixed dollar amount of a particular investment on a regular schedule, regardless of the share price. More shares are purchased when prices are low, and fewer shares are bought when prices are high.

- a. Reviewed Monthly
- b. One to Three Morningstar Asset Classes selected - Utilize an Asset Class that is believed to remain flat or decrease in value over the next 30-60 days.

**Risk of Loss** – There are risks inherent in all financial decisions and transactions. PLAN CONFIDENCE CORPORATION cannot guarantee the current or future performance of investment recommendations, client accounts performance, or the success of any investment decision or strategy that PLAN CONFIDENCE CORPORATION may recommend to a client.

### Item 9 Disciplinary Information

PLAN CONFIDENCE CORPORATION has no disciplinary information history to disclose. PLAN CONFIDENCE CORPORATION IARs have no disciplinary information history to disclose.

### Item 10 Other Financial Industry Activities and Affiliations

PLAN CONFIDENCE CORPORATION is not registered as a broker-dealer, futures commission merchant, commodity pool operator or commodity trading advisor and will not become registered in any of these capacities.

No PLAN CONFIDENCE CORPORATION IAR is an associate of a futures commission merchant, commodity pool operator or commodity trading advisor. PLAN CONFIDENCE CORPORATION's IARs will not become registered or associated in any of these capacities.

Kevin Clark, RFTM is also a registered representatives and investment adviser representative of NEXT Financial Group, Inc. (“NEXT”). NEXT is registered as a full service, general securities broker-dealer, and as a registered investment adviser with the SEC. NEXT is also a member of the Financial Industry Regulatory Authority, Inc. (“FINRA”) and the Securities Investor Protection Corporation (“SIPC”).

NEXT is a wholly owned subsidiary of NEXT Financial Holdings, Inc. NEXT Financial Holdings, Inc. is not a publicly traded company, however some Registered Representatives of NEXT may be individual stock holders in NEXT Financial Holdings, Inc. PLAN CONFIDENCE CORPORATION is required to pay certain fees to NEXT Financial Group, Inc., for the surveillance that NEXT is required to conduct. The payment of such fees may increase

revenues to NEXT which may increase the value of NEXT Financial Holdings, Inc. shares they may hold. Clients should be aware that this is a perceived conflict of interest.

Because of Kevin Clark's, RF<sup>TM</sup> affiliation with NEXT, he may have three different but concurrent roles:

1. As a registered representative with NEXT who may receive commissions for recommending securities;
2. As an investment adviser representative of NEXT who may receive a fee for rendering advisory services (applicable only for states in which dual registration is permitted); and
3. As an investment adviser representative of PLAN CONFIDENCE CORPORATION who offers services outside of NEXT.

PLAN CONFIDENCE CORPORATION is not affiliated with NEXT. Clients should be clear which entity the services are being offered through, and that the appropriate disclosure documents have been obtained. It is important to note that the information of Clients using the services of PLAN CONFIDENCE CORPORATION will be shared with NEXT for the purpose of surveilling transactions in the Clients' account(s) and for billing.

Kevin Clark, RF<sup>TM</sup> is also the owner of and a licensed insurance agent with Quintessential Retirement Services, Inc. In his capacities as an insurance agent he may sell fixed insurance products for sales commissions.

PLAN CONFIDENCE CORPORATION addresses these Compensation conflicts through the following PLAN CONFIDENCE CORPORATION Compliance Oversight Policies:

**Conflicts of Interest** – PLAN CONFIDENCE CORPORATION must disclose any potential or actual conflicts of interest when dealing with clients.

**PLAN CONFIDENCE CORPORATION Obligations** – PLAN CONFIDENCE CORPORATION is subject to the following specific obligations when dealing with clients:

- The duty to have a reasonable, independent basis for its investment advice;
- The duty to ensure that investment advice is suitable to meeting the client's individual objectives, needs, and circumstances; and, a duty to be loyal to clients.

Kevin T. Clark, RF<sup>TM</sup>, the President and Chief Compliance Officer (CCO) of PLAN CONFIDENCE CORPORATION, is responsible for supervising PLAN CONFIDENCE CORPORATION's investment advisor services. The main reports and documents the CCO reviews to supervise/review these activities are Client Profiles and Morningstar Reports.

#### **Item 11 Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

PLAN CONFIDENCE CORPORATION adopted the following "Code of Ethics" governing the conduct of personal securities trading by persons associated with it (Associates). The purpose of this Code of Ethics is to foster compliance with applicable federal and state statutes and regulatory requirements and to eliminate transactions suspected of being in conflict with the best interests of PLAN CONFIDENCE CORPORATION's clients.

- PLAN CONFIDENCE CORPORATION does not recommend securities to clients in which PLAN CONFIDENCE CORPORATION or Associates have a material financial interest.
- PLAN CONFIDENCE CORPORATION does not recommend individual securities to clients, or buys or sells securities for client accounts.

**Conflicts of Interest** – PLAN CONFIDENCE CORPORATION must disclose any potential or actual conflicts of interest when dealing with clients.

**PLAN CONFIDENCE CORPORATION Obligations** – PLAN CONFIDENCE CORPORATION and its investment adviser representatives are subject to the following specific obligations when dealing with clients:

- The duty to have a reasonable, independent basis for its investment advice; and

- The duty to ensure that investment advice is suitable to meeting the client's individual objectives, needs, and circumstances based on client's risk profile; and a duty to be loyal to the client.

If you have any questions regarding PLAN CONFIDENCE CORPORATION's Code of Ethics please contact PLAN CONFIDENCE CORPORATION by e-mail at [support@planconfidence.com](mailto:support@planconfidence.com).

#### **Item 12 Brokerage Practices**

PLAN CONFIDENCE CORPORATION does not manage client accounts or client brokerage assets.

#### **Item 13 Review of Accounts**

PLAN CONFIDENCE CORPORATION will rescore all accounts any time a participant provides us a new fund line up or at a minimum twice per year. The Strategic and Strategic/Blend Asset Allocation Models will be reviewed monthly. The Tactical Asset Allocation will be reviewed every day the United States New York Stock Exchange is open for normal business. Participants will be notified via email as a primary source of communication to log in to their active Plan Confidence account to review. Participants may also download the iOs (Apple) and/or the Android (Google) app from the Plan Confidence website or the iTunes Store (Apple) or Google Play Store (Google).

#### **Item 14 Client Referrals and Other Compensation**

PLAN CONFIDENCE CORPORATION compensates Solicitors for referring investment advisory clients to PLAN CONFIDENCE CORPORATION. Solicitors may be compensated up to 50% of the Plan Confidence™ services fee clients pay PLAN CONFIDENCE CORPORATION. Solicitors are independent contractors and not affiliated with PLAN CONFIDENCE CORPORATION. These Solicitor relationships do not increase the Plan Confidence™ services fee that clients pay PLAN CONFIDENCE CORPORATION. Solicitor Agreements entered into between PLAN CONFIDENCE CORPORATION and Solicitors will at all times be in compliance with the rules and regulations under 17 CFR Section 275.206(4)-3 and corresponding state rules and regulations on investment adviser solicitor activities. PLAN CONFIDENCE CORPORATION shall be solely responsible for providing Plan Confidence™ services advice on the account(s) that clients establish with PLAN CONFIDENCE CORPORATION.

#### **Item 15 Custody**

PLAN CONFIDENCE CORPORATION does not maintain custody of client accounts or assets.

#### **Item 16 Investment Discretion**

PLAN CONFIDENCE CORPORATION has no discretionary authority over client accounts or assets.

#### **Item 17 Voting Client Securities**

PLAN CONFIDENCE CORPORATION will not exercise proxy-voting authority over the securities held in client accounts or Qualified Retirement Plans. The obligation to vote client proxies shall at all times rest with the clients.

#### **Item 18 Financial Information**

Since PLAN CONFIDENCE CORPORATION does not maintain custody of client accounts or assets, and has no financial situations which may impair its ability to conduct business PLAN CONFIDENCE CORPORATION has no financial information to report.



**Disclosure Brochure Supplement (DBS)**  
March 23, 2017

**DBS Item 1 Cover Page**

**Kevin T. Clark, RF<sup>TM</sup>**  
**President and CCO**  
**PLAN CONFIDENCE CORPORATION**  
CRD # 2973609

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Website: [www.PlanConfidence.com](http://www.PlanConfidence.com)

This Disclosure Brochure Supplement provides information about Kevin Clark, RF<sup>TM</sup> that supplements the PLAN CONFIDENCE CORPORATION Disclosure Brochure referenced above. If you have any questions about the contents of the PLAN CONFIDENCE CORPORATION Disclosure Brochure and Disclosure Brochure Supplement, please contact Kevin Clark, RF<sup>TM</sup> by phone at 312-373-0772 or e-mail at [support@PlanConfidence.com](mailto:support@PlanConfidence.com). Additional information about Kevin Clark, RF<sup>TM</sup> is available on the SEC's website at: [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**DBS Item 2 Educational Background and Business Experience**

- **Year of Birth: 1973**
- **Education: Beloit College – Beloit WI, BA in Pre-Law/Sociology August 1991 – May 1995**
- **Business Background over the last five years:**
  - PLAN CONFIDENCE CORPORATION, Investment Adviser, President & CCO, March 2016 to present
  - NEXT Financial Group, Inc. Broker-Dealer/ Investment Adviser, Registered Representative and Investment Adviser Representative, March 2005 to present
  - Reddark Technologies, Inc. Software Sales and Service, CEO/Co-Owner, November 2011 to present
  - Quintessential Retirement Services, Inc., Insurance Sales, President, March 2005 to present
- **Professional Designations and Professional Licenses**
  - Investment Company Products/Variable Contract Representative Examination, November 1997
  - Uniform Securities Agent State Law Examination, Series 63, January 1998
  - Uniform Combined State Law Examination, Series 65, September 1998
  - Registered Fiduciary (RF<sup>TM</sup>) - The RF<sup>TM</sup> certification identifies financial professionals that have achieved pertinent academic qualifications and licenses, learned required practices, have passed a background check, completed a certification test and continue ongoing education. January 2016

**DBS Item 3 Disciplinary Information**

- Kevin Clark, RF<sup>TM</sup> has no disciplinary information history to disclose.

#### **DBS Item 4 Other Business Activities**

- **Broker-Dealer and Other Investment Adviser**

Kevin Clark, RF<sup>TM</sup> (IAR) is affiliated with NEXT as a Registered Person. NEXT is registered as a broker/dealer and an Investment Advisor with the Securities and Exchange Commission (“SEC”) and is a member of Financial Industry Regulatory Authority, Inc. (“FINRA”). Registered Persons affiliated with NEXT Financial Group, Inc. recommend certain securities for which they receive a commission, markup or markdown. Registered Persons affiliated with NEXT that offer various advisory services for which they receive a fee are called Investment Adviser Representatives (“IARs”). Commissions/markups/markdowns for effecting securities transactions are separate and apart from the fees charged by NEXT’s IARs for advisory services.

NEXT Financial Holdings, Inc. is the parent company of NEXT Financial Group, Inc. Some IARs may be stockholders of NEXT Financial Holdings, Inc. A portion of fees and commissions paid by clients may be paid to the parent company, and may benefit those IARs who are stockholders.

NEXT and the IAR may receive compensation from the sale of securities or other investment products, including but not limited to: investment company securities, variable products, or other assets purchased within advisory accounts. Additionally, these products may have additional internal expenses such as custodial fees, account maintenance fees and/or a portion of fund manager fees that the client will pay indirectly through the cost of the fund. This compensation may be in addition to any advisory fee and may result in increased costs to the client. This creates a potential conflict of interest; however, NEXT has implemented a policy that states that IARs may not receive commissions and advisory fees simultaneously for products purchased in an advisory account. An IAR may, however, recommend, and/or sell a product to the client, receive a commission, and link that product to an advisory account after one year for ongoing management services. In lieu of waiting a full year to link the product to the product to the advisory account, the IAR may utilize the Fee Offset Program described in the applicable NEXT Form ADV Part 2A Disclosure Brochure.

Kevin Clark, RF<sup>TM</sup> currently spends 40% of his business time on these NEXT activities. PLAN CONFIDENCE CORPORATION is not an affiliated company of NEXT.

- **Insurance**

Kevin Clark, RF<sup>TM</sup> is the owner of and a licensed insurance agent with Quintessential Retirement Services, Inc. In his capacities as an insurance agents he may sell fixed insurance products for sales commissions. Kevin Clark, RF<sup>TM</sup> currently spends less than 5 % of his time on these activities.

- **Other**

Kevin Clark, RF<sup>TM</sup> is CEO/Co-Owner Reddark Technologies, Inc. a software sales and service provider. Kevin Clark, RF<sup>TM</sup> currently spends 20 % of his time on these activities.

#### **DBS Item 5 Additional Compensation**

Kevin Clark, RF<sup>TM</sup> has no other additional compensation

#### **DBS Item 6 Supervision**

Kevin Clark, RF<sup>TM</sup> is the Chief Compliance Officer and Supervisor for PLAN CONFIDENCE CORPORATION.

## **Plan Confidence Corporation**

### **Privacy Policy**

Plan Confidence™ Services is an “internet only” service provided by Plan Confidence Corporation (and herein after referred to as the "site"). Plan Confidence Corporation values and respects the privacy of all its users. By accessing, browsing and using the site you agree that you have read and understood and agree to be bound by our Terms and Conditions and Privacy Policy.

Plan Confidence Corporation collects basic and minimum information needed to set up an account on the site. The only information that is required to set up your account on our site is:

- Your Name
- Your Date of Birth
- Your residential address
- Your email address
- Available investment options of your plan
- Your plan name(s) and plan website URL(s)
- (optional) Summary Plan Description

We do NOT store your password in our data. You may change your password at any time on the site. We do use "logs" when you access our site. Our servers automatically record certain information in an industry standard way. The "logs" record the date/ time you access the site, your current assigned risk profile, the date/time you took the Risk Assessment and selected a "risk profile" and the date/ time you "Agreed to" our Agreement Terms and Conditions, Form ADV Part 2A Disclosure Brochure, Form ADV Part 2B Disclosure Brochure Supplement and Privacy Policy.

Plan Confidence Corporation does not disclose any of your personal information to any company that is not affiliated with us outside of unaffiliated service providers and vendors that perform technical, administrative, consulting or legal services for us. However, our contractual arrangements with these service providers require them to treat your information as confidential.

We do not sell information about current or former clients to third parties, nor is it our practice to disclose such information to third parties unless requested to do so by a client or client representative or, if necessary, in order to process a transaction, service an account or as permitted by law.

Your information may also be disclosed to an auditor or examiner if selected during our routine annual audits as required by the Department of Labor (DOL), the Securities Exchange Commission (SEC), state regulator, and/ or the Financial Industry Regulatory Authority (FINRA). Your information may be disclosed in the event of a legal proceeding or if ordered by the Government.

We take appropriate security measures to protect your data. In order to protect your personal information, we maintain physical, electronic and procedural safeguards to protect your personal information. Only authorized personnel have access to our database through a password protected site.

This Privacy Policy may change from time to time. If any significant change occurs to this Privacy Policy, you will be notified by having it "pop up" on the site which will have to be "Agreed to" prior to continuing use of the site.

If you have any questions regarding our Privacy Policy, please contact us at [support@planconfidence.com](mailto:support@planconfidence.com).