

## Form ADV Part 3: Relationship Summary PlanVision

### Introduction

PlanVision (“PlanVision” or “we”) is an investment adviser registered with the U.S. Securities and Exchange Commission. We offer our clients investment advisory services. Clients should understand that the services we provide and fees we charge are different than those of a broker-dealer, and that it is important to understand the difference between the two. Free and simple tools are available to research firms and financial professional at <https://www.investor.gov/CRS>, which also provides educational materials about investment advisers, broker-dealers and investing.

### What Investment Services and Advice Can You Provide Me?

**Description of Services:** PlanVision offers investment advisory services to retail investors. Our investment advisory services include: Financial Planning and Consulting Services.

*Financial Planning & Consulting Services:* We also provide financial planning and consulting services. Financial planning services involve us creating a written financial plan for you which covers mutually agreed upon topics. Financial consulting is used when a written financial plan isn’t needed. It involves one time and/or ongoing meetings to discuss your financial situation. Please see **Item 4** of our **Form ADV Part 2A**.

**Limited Investment Offerings:** We do not primarily recommend one type of security to clients. Instead, we recommend investment portfolios designed to be suitable for each client relative to that client’s specific circumstances and needs. However, we are limited in investment selection in that we can only invest your account in securities which are available on your custodian/broker-dealer’s platform. When providing you services, we do not recommend or offer advice on any proprietary products.

**Account & Fee Minimums:** There are no minimum investment amounts or conditions required for establishing your investment account. The fixed fee generally charged for financial planning services is currently \$189.

*Conversation Starters: Given my financial situation, should I choose an investment advisory service? Why or why not? How will you choose investments to recommend to me? What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?*

### What Fees Will I Pay?

#### Description of Principal Fees & Costs:

Financial Planning & Consulting Services Fees - We provide financial planning and consulting services under a fixed fee arrangement. The annual fee is generally \$189 which is billed up front for the first year and then renews at \$8 a month after the first year.

Any fees we charge for financial planning and consulting services will not cover your brokerage or other costs associated with implementing any recommendations we may make.

**Additional Information:** You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time.

Please make sure you understand what fees and costs you are paying. For more information about the fees we charge and the other fees and expenses you will incur, please see **Item 5 of Form ADV Part 2A**.

*Conversation Starters: Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?*

What Are Your Legal Obligations to Me When Acting as My Investment Adviser?

How Else Does Your Firm Make Money and What Conflicts of Interest Do You Have?

**Standard of Conduct:** When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you.

Here is an example to help you understand what this means. We allow our employees to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities we recommend (purchase or sell) to you presents a conflict of interest for which we have developed procedures to mitigate and control for those conflicts. For more information see **Item 11 of our Form ADV Part 2A**.

**Additional Information:** For more information about our conflicts of interests and the ways we are compensated, please see **Item 5** and **Item 10** of our **Form ADV Part 2A**.

Do You or Your Financial Professionals Have Legal or Disciplinary History?

Neither us, nor our investment adviser representatives have a legal or disciplinary history to report. You can look up more information about us and our investment adviser representatives at <https://www.investor.gov/CRS>.

*Conversation Starters: As a financial professional, do you have any disciplinary history? For what type of conduct?*

How Do Your Financial Professionals Make Money?

**Description of Salary/Payment of IARs:** We compensate our investment adviser representatives with a flat salary not dependent on the level of revenue they generate for the firm.

Additional Information About PlanVision

Additional information about us and copies of our Form ADV Part 2A disclosure brochure and this relationship summary are available on the Internet at [www.planvisionmn.com](http://www.planvisionmn.com). You can also find our disclosure brochures and other information about us at <https://adviserinfo.sec.gov/firm/summary/166311>. If you have any questions or want an up-to-date copy of this relationship summary, we can be reached by phone at (612) 965 4286

*Conversation Starters: Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?*



**Item 1 Cover Page**

**PlanVision**

**Form ADV Part 2A – Disclosure Brochure**

**September 2021**

This Disclosure Brochure provides information about the qualifications and business practices of PlanVision. If you have any questions about the contents of this Disclosure Brochure, please contact us at (612) 965 4286.

PlanVision is a Registered Investment Advisor with the U.S. Securities and Exchange Commission (“SEC”). Registration of an Investment Advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about PLANVISION to assist you in determining whether to retain the Advisor.

Additional information about PlanVision and its advisory persons are available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**PlanVision, LLC**  
**CRD No: 166311**  
**2669 Averon Dr.**  
**Fuquay-Varina, NC 27526**  
**Phone: (612) 965 4286**

[www.planvisionmn.com](http://www.planvisionmn.com)

## Item 2 – Material Changes

In September 2021, the firm move its main office to the location noted on the cover page of this Disclosure Brochure.

Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about advisory personnel of PLANVISION.

PLANVISION believes that communication and transparency are the foundation of our relationship and continually strive to provide our Clients with the complete and accurate information at all times. We encourage all current and prospective Clients to read this Disclosure Brochure and discuss any questions you may have with us. And of course, we always welcome your feedback. PLANVISION became registered as a Registered Investment Advisor in 2012. The initial disclosure brochure was effective April 12, 2012.

### Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of PLANVISION.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). To review the firm information for PLANVISION:

- Click **Investment Advisor Search** in the left navigation menu.
- Select the option for **Investment Advisor Firm** and enter **166311** (our firm's CRD number) in the field labeled "Firm IARD/CRD Number".
- This will provide access to Form ADV Part 1 and Part 2.
- Item 11 of the ADV Part 1 lists legal and disciplinary questions regarding the Advisor.
- In the left navigation menu, Form ADV Part 2 is located near the bottom.

You may also request a copy of this Disclosure Brochure at any time, by contacting us at (612) 965 4286.

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## Item 4 – Advisory Services

### A. Firm Information

PlanVision (“PLANVISION” or the “Advisor”) is a Registered Investment Advisor with the US Securities & Exchange Commission, which is organized as a Limited Liability Company (LLC) under the laws of the State of Minnesota. PLANVISION was founded in April 2012 and is owned and operated by Mark Zoril. This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by PLANVISION.

### B. Advisory Services Offered

**Financial Planning and Consulting Services** – PLANVISION provides advisory services in the form of financial planning services to individuals not affiliated with our Retirement Plan Sponsor clients. Financial planning services do not involve the active management of client accounts, but instead focuses on a client’s overall financial situation. Financial planning can be described as helping individuals determine and set their long-term financial goals, through investments, tax planning, asset allocation, risk management, retirement planning, and other areas. The role of a financial planner is to find ways to help the client understand his/her overall financial situation and help the client set financial objectives.

A financial plan developed for or financial consultation rendered to the Client will usually include general recommendations for a course of activity or specific actions to be taken by the Client. For example, recommendations may be made that the Client start or revise their investment programs, commence or alter retirement savings, establish education savings and/or charitable giving programs. PLANVISION may also refer Clients to an accountant, attorney or other specialist, as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of Client’s financial situation, observations, and recommendations. For consulting or ad-hoc engagements, the Advisor may not provide a written summary. Plans or consultations are typically completed within six months of contract date, assuming all information and documents requested are provided promptly. These can also be on an indefinite basis as well.

Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to effect the transaction through the Advisor.

### C. Client Account Management

PLANVISION’s services are limited to providing investment advice only and not asset management services to Clients.

#### **D. Wrap Fee Programs**

PLANVISION does not manage or place Client assets into a wrap fee program. Investment management services are provided directly by PLANVISION.

#### **E. Assets Under Management**

PLANVISION does not actively manage client assets.

### **Item 5 – Fees and Compensation**

The following paragraphs detail the fee structure and compensation methodology for investment management.

#### **A. Fees and Billing for Advisory Services**

##### **Financial Planning and Consulting Services:**

PlanVision is a fee-only financial planning and investment advisory firm. The client will pay us for financial planning service delivered, such as a retirement projection, asset allocation recommendations, fee assessment, insurance needs analysis, education funding review, etc. This charge will never be greater than \$500. This will involve additional updates on a client's investment allocations as necessary, rebalancing suggestions, outreach to verify any modifications in their circumstance that affects their plan, and the ability for clients to contact us directly, at any time and as frequently as they would like to provide assistance with any questions they may have over the subsequent 12 months. **Virtually all of our clients pay \$149.** For clients that want to visit with us in person, there will likely be an additional charge. We offer a money back guarantee for individual clients if they are not satisfied with our recommendations or guidance. They can request their money back by 60 days from their date of payment for the first year of guidance. Our clients purchase our service with credit or debit card and their annual fee of \$189 renews each month after the first 12 months for \$8/month. We do not notify our clients prior to their 12 month renewal at \$8 a month. Clients can cancel their PlanVision guidance any time.

#### **B. Fee Billing and Renewals**

Clients purchase our guidance directly from our public website.

#### **C. Other Fees and Expenses**

Clients may incur certain fees or charges imposed by third parties, other than PLANVISION, in connection with investment made on behalf of the Client's account[s]. The Client is responsible



for all custodial and securities execution fees charged by the custodian and executing broker-dealer. The Investment Advisory Fee charged by PLANVISION is separate and distinct from these custodian and execution fees.

In addition, all fees paid to PLANVISION for investment advisory services are separate and distinct from the expenses charged by mutual funds and exchange-traded funds to their shareholders, if applicable, or any other investment security. These fees and expenses are described in each fund's or investment's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client could invest in these products directly, without the services of PLANVISION, but would not receive the services provided by PLANVISION which are designed, among other things, to assist the Client in determining which products or services are most appropriate to each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by PLANVISION to fully understand the total fees to be paid.

#### **D. Compensation for Sales of Securities**

PLANVISION does not buy or sell securities and does not receive any compensation for securities transactions in any Client account, other than the Investment Advisory Fees noted above.

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

PLANVISION does not charge performance-based fees for its investment advisory services. The fees charged by PLANVISION are as described in Item 5 – Fees and Compensation above are not based upon the capital appreciation of the funds or securities held by any Client.

PLANVISION does not manage any proprietary investment funds or limited Partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

### **Item 7 – Types of Clients**

PLANVISION works with individuals for financial planning.

PLANVISION does not impose a minimum account size for establishing a relationship.

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

#### **A. Methods of Analysis**

PLANVISION primarily employs fundamental analysis methods in developing investment strategies for its Clients. Research and analysis from PLANVISION is derived from numerous

sources, including financial media companies, third-party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

As noted above, PLANVISION generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. PLANVISION also promotes using a simplified approach to investing with a heavy emphasis on using passive investments to help investors of all types broadly diversify their portfolios and reduce their management fees.

## **B. Risk of Loss**

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the risk of loss. PLANVISION will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

Fundamental analysis utilizes economic and business indicators as investment selection criteria. These criteria are generally ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included in Item 13.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process. **Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor. For more information on our investment management services, please contact us at (612) 965 4286.**

## **Item 9 – Disciplinary Information**

**There are no legal, regulatory or disciplinary events involving PLANVISION or any of its employees.** PLANVISION and its advisory personnel value the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider in which you Partner. Our backgrounds are on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). To review the firm information contained in ADV Part 1, select the option for Investment Adviser Firm and enter **166311** in the field labeled “Firm IARD/CRD Number”. This will provide access to Form ADV Parts 1 and 2. Item 11 of the ADV Part 1 lists legal and disciplinary questions.

## **Item 10 – Other Financial Industry Activities and Affiliations**

### **A. Broker Dealer Affiliation**

Neither PLANVISION nor its advisory persons are registered, or have an application pending to register as a broker-dealer.

### **B. Other Affiliations**

Neither PLANVISION nor its advisory persons are registered, or have an application pending to register, as a futures commission merchant (“FCM”), commodity pool operator (“CPO”), a commodity trading advisor (“CTA”), or an associated person of any such entity.

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

### **A. Code of Ethics**

PLANVISION has implemented a Code of Ethics that defines our fiduciary commitment to each Client. This Code of Ethics applies to all persons associated with PLANVISION. The Code of Ethics was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. PLANVISION and its personnel owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of PLANVISION associates to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code of Ethics covers a range of topics that may include; general ethical principles, reporting personal securities trading, reportable securities, initial public offerings and private placements, reporting ethical violations, distribution of the Code of Ethics, review and enforcement processes, amendments to Form ADV and supervisory procedures. PLANVISION has written its Code of Ethics to meet and exceed regulatory standards. To request a copy of our Code of Ethics, please contact us at (612) 965 4286.

### **B. Personal Trading with Material Interest**

PLANVISION allows our employees to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. PLANVISION does not act as principal in

any transactions. In addition, the Advisor does not act as the general Partner of a fund, or advice an investment company. PLANVISION does not have a material interest in any securities traded in Client accounts.

### **C. Personal Trading in Same Securities as Clients**

PLANVISION allows our employees to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities we recommend (purchase or sell) to you presents a conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. As noted above, we have adopted, consistent with Section 204A of the Investment Advisers Act of 1940, a Code of Ethics, which addresses insider trading (material non-public information controls) and personal securities reporting procedures. We have also adopted written policies and procedures to detect the misuse of material, non-public information. We may have an interest or position in certain securities, which may also be recommended to you.

In addition, the Code of Ethics governs Gifts and Entertainment given by and provided to the Advisor, outside employment activities of employees, Employee reporting, sanctions for violations of the Code of Ethics, and records retention requirements for various aspects of the Code of Ethics.

### **D. Personal Trading at Same Time as Client**

While PLANVISION allows our employees to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, at no time, will PLANVISION or any associated person of PLANVISION, transact in any security to the detriment of any Client.

## **Item 12 – Brokerage Practices**

### **A. Recommendation of Custodian[s]**

PLANVISION does not have discretionary authority to select the broker-dealer, custodian, administrator or trustee for custodial and execution services on behalf Client accounts. Where PLANVISION does not exercise discretion to select these providers, PLANVISION may recommend providers to Clients, as appropriate.

Following are additional details regarding the brokerage practices of the Advisor:

- 1. *Soft Dollars*** - Soft dollars are revenue programs offered by broker-dealers whereby an advisor enters into an agreement to place security trades with the broker in exchange for research and other services. **PLANVISION does not participate in soft dollar programs sponsored or offered by any broker-dealer.**
- 2. *Brokerage Referrals*** - PLANVISION does not receive any compensation from any third party in connection with the recommendation for establishing an account.

**3. Directed Brokerage** - Not all investment advisers require their clients to direct brokerage activity through any particular broker-dealer. PLANVISION does not routinely recommend, request, or require that Clients direct PLANVISION as to how to execute brokerage transactions for their accounts.

**B. Aggregating and Allocating Trades**

The Advisor does not aggregate Client orders.

**Item 13 – Review of Accounts**

**A. Frequency of Reviews**

Formal reviews are generally conducted at least annually or more or less frequently depending on the needs of the Client.

**B. Causes for Reviews**

In addition to the investment monitoring noted in Item 13.A., each Client account shall be reviewed at least annually. Reviews may be conducted more or less frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account. The Client is encouraged to notify PLANVISION if changes occur in his/her personal financial situation that might adversely affect his/her investment plan. Additional reviews may be triggered by material market, economic or political events.

**C. Review Reports**

The Client will receive brokerage or account statements no less than quarterly from the trustee or custodian. These statements are sent directly from the custodian to the Client. The Client may also establish electronic access to the custodian's website so that the Client may view these reports and their account activity. Client statements will include all positions, transactions and fees relating to the Client's account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

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

**A. Compensation Received by PLANVISION**

PLANVISION is a fee-only advisory firm, who, in all circumstances, is compensated solely by the Client. PLANVISION does not receive commissions or other compensation from product sponsors, broker dealers or any un-related third parties. PLANVISION may refer Clients to various third parties to provide certain financial services necessary to meet the goals of its Clients. Likewise, PLANVISION may receive referrals of new Clients from a third-party.

**B. Client Referrals from Solicitors**

PLANVISION does not engage paid solicitors for Client referrals.

### **Item 15 – Custody**

PLANVISION does not accept or maintain custody of any Client accounts. All Clients must place their assets with a qualified custodian. PLANVISION Financial will recommend custodians and then clients select their own custodian to retain their funds and securities and direct PLANVISION to utilize that custodian for the Client's security transactions. PLANVISION encourages Clients to review statements provided by account custodian. For more information about custodians and brokerage practices, see Item 12 - Brokerage Practices.

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

PLANVISION does not accept investment discretion over the trading of client accounts

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

PLANVISION does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting.

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

Neither PLANVISION, nor its management has any adverse financial situations that would reasonably impair the ability of PLANVISION to meet all obligations to its Clients. Neither PLANVISION, nor any of its advisory persons, has been subject to a bankruptcy or financial compromise. PLANVISION is not required to deliver a balance sheet along with this Brochure as the firm does not collect advance fees for services to be performed six months or more in advance.

**Form ADV Part 2B – Brochure Supplement – Mark Zoril**

**PlanVision  
CRD No: 166311  
2669 Averon Dr.  
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Phone: (612) 965 4286**

**[www.mefinancialgroup.com](http://www.mefinancialgroup.com)**

**Effective: September 2021**

This Brochure Supplement provides information about the background and qualifications of Mark A. Zoril (CRD# **2544722**) in addition to the information contained in the PlanVision (“PLANVISION” or the “Advisor” - CRD #166311) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you any questions about the contents of the PLANVISION Disclosure Brochure or this Brochure Supplement, please contact us at (612) 965 4286.

Additional information about Mr. Zoril is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 – Educational Background and Business Experience

Mark A. Zoril is Owner of PlanVision. Mr. Zoril, born in 1965, is a dedicated Advisor for Client accounts of PLANVISION. Additional information regarding Mr. Zoril's employment history is included below.

### Employment History:

Owner, PlanVision	04/2012 to Present
Financial Advisor, LPL Financial	04/2012 to 02/2013
Financial Advisor, Valic Investment Services Company	10/1998 to 04/2012
The Variable Annuity Marketing Company	09/1994 to 12/2001

## Item 3 – Disciplinary Information

*There are no legal, civil or disciplinary events to disclose regarding Mr. Zoril.* Mr. Zoril has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Zoril.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. *As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Zoril.* However, we do encourage you to independently view the background of Mr. Zoril on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Select Investment Adviser Search from the left navigation menu. Then select the option for Investment Adviser Representative and enter 2544722 in the field labeled "Individual CRD Number".

## Item 4 – Other Business Activities

Please see Item 10 of this Disclosure Brochure for details regarding Mr. Zoril's other business activities.

## Item 5 – Additional Compensation

Other than the fees detailed in Item 5 and Item 14 of this Disclosure Brochure, Mr. Zoril receives no other compensation related to advisory services provided to clients.

## Item 6 – Supervision



Mr. Zoril serves as Owner and Chief Compliance Officer of PLANVISION. Mr. Zoril can be reached at (612) 965 4286.

PLANVISION has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of PLANVISION. Further, PLANVISION is subject to regulatory oversight by various agencies. These agencies require registration by PLANVISION and its employees. As a registered entity, PLANVISION is subject to examinations by regulators, which may be announced or unannounced. PLANVISION is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

## Privacy Policy

Effective: March 20, 2013

### Our Commitment to You

PlanVision (“PLANVISION”) is committed to safeguarding the use of your personal information that we have as your Investment Advisor. PLANVISION (also referred to as "we", "our" and "us" throughout this notice) protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you. Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything we can to maintain that trust.

PLANVISION does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and proper business purposes in connection with the servicing and management of our relationship with you as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Privacy Policy.

<b>Why you need to know?</b>	
Registered Investment Advisors (“RIAs”) share some of your personal information. Federal and State laws give you the right to limit some of this sharing. Federal and State laws require RIAs to disclose how we collect, share, and protect your personal information.	
<b>What information do we collect from you?</b>	
Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number(s)	Income and expenses
E-mail address(es)	Investment activity
Account information (including other institutions)	Investment experience and goals
<b>What sources do we collect information from in addition to you?</b>	
Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

**How we share your information?**

RIAs do need to share personal information regarding its clients to effectively implement the RIA's services. In the section below, we list some reasons we may share your personal information.

<b>Basis for sharing</b>	<b>Sharing</b>	<b>Limitations</b>
<p><b>Servicing our Clients</b></p> <p>We may share non-public personal information with non-affiliated third parties (such as brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed services to you consistent with applicable law, including but not limited to:</p> <ul style="list-style-type: none"> <li>• Processing transactions;</li> <li>• General account maintenance;</li> <li>• Responding to regulators or legal investigations;</li> </ul> <p>and credit reporting, etc.</p>	<p>PLANVISION may share this information.</p>	<p>Clients cannot limit the Advisors ability to share.</p>
<p><b>Administrators</b></p> <p>We may disclose your non-public personal information to companies we hire to help administrate our business. Companies we hire to provide services of this kind are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of your personal information to the performance of the specific service we have requested.</p>	<p>PLANVISION may share this information.</p>	<p>Clients cannot limit the Advisors ability to share.</p>
<p><b>Marketing Purposes</b></p> <p>PLANVISION does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where PLANVISION or the client has a formal agreement with the financial institution. <b>We will only share information for purposes of servicing your accounts, not for marketing purposes.</b></p>	<p>PLANVISION does not share personal information.</p>	<p>Clients cannot limit the Advisors ability to share.</p>

<p><b>Authorized Users</b></p> <p>In addition, your non-public personal information may also be disclosed to you and persons we believe to be your authorized agent or representative.</p>	<p>PLANVISION does share personal information.</p>	<p>Clients can limit the Advisors ability to share.</p>
<p><b>Information About Former Clients</b></p> <p>PLANVISION does not disclose, and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our clients.</p>	<p>PLANVISION does not share personal information regarding former clients</p>	<p>Clients can limit the Advisors ability to share.</p>
<p><b>How do we protect your information?</b></p>		
<p>To safeguard your personal information from unauthorized access and use, we maintain physical, procedural and electronic safeguards. These include computer safeguards such as passwords, secured files and buildings.</p>		
<p>Our employees are advised about PLANVISION's need to respect the confidentiality of each client's non-public personal information. We train our employees on their responsibilities.</p>		
<p>We require third parties that assist in providing our services to you to protect the personal information they receive. This includes contractual language in our third party agreements.</p>		

<p><b>Changes to our Privacy Policy.</b></p>
<p>We will send you notice of our Privacy Policy annually for as long as you maintain an ongoing relationship with us.</p>
<p>Periodically we may revise our Privacy Policy and will provide you with a revised policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.</p>

<p><b>Questions:</b> You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (612) 965 4286.</p>
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