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PRIVACY POLICY

We recognize that our relationship is based on trust. We are committed to keeping your trust and confidence by protecting your confidential information.

Information We Collect

We obtain public and non-public information about our clients. Information may be provided by you or from other parties that you authorize to share information with us. Information collected may include the following:

- Personal information for you and your immediate family members such as name, address, email, phone number, marital status, citizenship, birth date, driver's license number, occupation, employer, and SSN/TIN number.
- Financial information such as financial goals, net worth, assets, debt obligations, income, employment pay, investment holdings, account numbers, tax returns, real estate appraisal, securities transactions, and account balances.
- Insurance policy information such as the following: employment benefit elections, life, disability, long term care, health insurance, auto, home, and umbrella coverage.
- Information on current and prior financial accounts. This can include holdings, transaction activity, balances, and similar data.
- Banking information such as banking institution, its contact information, type of account, routing number and account number.
- Beneficiary information for life insurance, retirement accounts, and annuities.
- Trusted contact information

We reserve the right to obtain personal information from third parties to verify your identity and prevent fraud.

Disclosure of Information

- We **do not sell information** about current or former clients to third parties.
- We do not disclose information to third parties *unless you approve*. Examples include:
 - Attorney, trustee, or someone else representing you in a fiduciary or advisory capacity.
 - Accountant or tax preparer.
 - Relevant information when requesting insurance or mortgage quotes on your behalf.
- We may share information with outside companies that perform administrative services for us, or the custodians that process transactions for your accounts. However, we require these service providers to treat your private information with the same high degree of confidentiality that we do.
- We will share information to government entities or other third parties in response to subpoenas or other legal process as required by law.

PRIVACY POLICY - continued

Information Security

- We maintain physical, electronic, and procedural safeguards to prevent unauthorized access. These include, but are not limited to, the following:
 - Our office is always locked (except when we are expecting clients for scheduled appointments).
 - Client information and documents are stored in electronic format. Any paper documents provided to us by clients will be promptly scanned to electronic format and returned to the client (or shredded if directed to do so by the client).
 - Client information is stored securely in the cloud. No client information other than name and address is stored on local workstations. Client data is neither accessed nor stored on personal smartphones or tablet devices.
 - All workstations are password protected, trusted platform module (TPM) enabled, and encrypted requiring a physical startup key. Remote access to workstations is accomplished using software employing 256-bit AES encryption.
 - Hardware and software passwords are changed periodically. Two-factor or multi-factor authentication is enabled when available.
 - Workstations are backed up periodically both to the cloud and to an electronic storage device which is kept offsite. All backups are encrypted.
 - We use a virtual private network (VPN), firewalls, and other electronic security measures to prevent unauthorized access to our workstations.
 - Workstations are periodically scanned for viruses and malware. Internet browser data (including tracking “cookies”) is regularly removed from workstations.
 - Confidential information will not be sent via unsecure email unless the client specifically directs us to do so.

Access to and Correction of Information

- Contact us to review your personal information or if you have any questions or concerns.
- If you notify us that information is incorrect, we will promptly review it. If we agree, we will correct our records accordingly. If we disagree, you may submit a statement of dispute.
- You may contact us by mail or by phone to request that your information be deleted. We reserve the right to take actions to verify your identity before deleting data.

Privacy Policy Communications

- Our Privacy Policy will continue to apply to you even if you are no longer an active client.
- We will provide our Privacy Policy annually as long as we have billed you for services in the previous 12 months. This annual notice is intended to comply with Federal and State laws regarding privacy.
- We reserve the right to update our Privacy Policy.