



Castling Financial Planning, Ltd. Privacy Policy Annual Notification for 2020

The following privacy policy is provided by Castling Financial Planning, Ltd. (henceforth identified as "**CastlingFP**"). This yearly notification is required by law and we are pleased to point out areas in which **CastlingFP** goes well beyond minimum legal requirements to protect your privacy. Please take a few minutes to review this policy and ask us if you have any questions. For the purposes of this privacy notice, when we use the term "consumer" below, we refer to all consumers, customers, clients, advisory clients, former clients and prospective clients, regardless of these terms specific legal or technical meaning. All consumers are afforded the same, equally high level of protection.

Our Commitment To You

CastlingFP respects the privacy rights of each of its consumers. Unlike most financial and investment advisers, Castling Financial Planning, Ltd. remains truly independent. We maintain no affiliation with other financial services companies, which would otherwise affect our judgement and actions. As a result, we are able to provide a strict policy respecting the privacy rights of every consumer. To that end, **CastlingFP** will not disclose non-public personal information about any consumer, without their prior written consent, unless required by law.

Under no circumstances will **CastlingFP** sell or barter consumer information to anyone. This includes the fact that you are, or may become, a client.

CastlingFP's advisory agreement may include an Optional Charitable Donation. In this case, the firm may mention the client's name in writing, to the IRS qualified charity chosen by the client, at the time of the donation. If the client should not desire that their identity be disclosed to the charitable organization, the client should make this known to **CastlingFP**, prior to submitting final payment to the firm, for services rendered.

CastlingFP maintains a Referral Arrangement, in which the firm may credit a consumer with two hours of free financial planning services, for making a referral that results in a new, paying (not pro bono) client for **CastlingFP**. No cash referral fees of any kind are paid by the firm.

The person referring a new client to **CastlingFP** can be termed a solicitor, but is never paid in cash or anything of value beyond receiving two additional (no cost) hours of financial planning services from the firm.

Please refer to the written Referral Arrangement for further details. No client is ever charged a higher fee or hourly rate due to having been referred by a solicitor. Naturally, the solicitor will know of the new client being referred. Likewise, the new client may know if the solicitor is also a client of **CastlingFP**. No personal information about either the new client or the referring client/solicitor will be disclosed, without their prior written consent.

Categories of Personal Information CastlingFP Collects and Holds

The kinds of personal information we collect may include the following:

- (1) General information we obtain from you via the **CastlingFP** Client Services Agreement or during an interview (conducted face to face, by telephone or via email): name, address, telephone, email address, gender, date of birth, occupation and employer.
- (2) Specific information we obtain from you during an interview or data gathering session with your consent: types of accounts owned, account numbers, assets, liabilities, income, financial planning goals and objectives. Some pieces of data are not relevant to our process, such as specific account numbers. We will collect this data only with your consent. The collection of other, relevant information is absolutely vital to fulfilling our mission of bringing you high quality financial planning services. As such, we are dependent upon you to openly share this information with us, such as types of financial accounts owned and asset amounts. Our ability to serve you depends upon a full and accurate reading of your present financial situation, subject to the terms of the Client Services Agreement and the specific services you have requested from **CastlingFP**.
- (3) Specific information we provide to you, such as the results of our analysis, our recommendations, strategies, suggested actions and any advice we may give you.
- (4) Information regarding your invoices and payments to **CastlingFP** for financial planning services rendered.

Opting-In Instead of Opting-Out

Unlike many financial and investment advisers, **CastlingFP** does not require its consumers to exercise opt-out rights. Opt-out is chosen automatically, by default. **CastlingFP** does not sell or distribute information to anyone without your consent, unless required by law. The only exceptions to this policy are the Optional Charitable Donation and Referral Arrangement provisions, mentioned above.

CastlingFP allows a consumer to provide written consent to (only) be identified as a client of the firm, for the purposes of providing a referral, or to be identified to a charitable

organization, in those cases where **CastlingFP** donates a portion of its fee to the client's chosen charity, as a result of financial planning services rendered and paid for.

Not only does **CastlingFP** not disclose any nonpublic information about consumers to any third party, but we go further, by NOT reserving the right to disclose nonpublic, personal information, other than as permitted by the following exceptions:

1. With the written consent of, or at the specific direction of the consumer, provided that the consumer has not revoked this consent or direction.
2. To protect the confidentiality or security of **CastlingFP's** records pertaining to the consumer; to protect against or prevent fraud or other liabilities; to persons holding legal or beneficial interest relating to the consumer; to persons acting in a fiduciary capacity on behalf of the consumer.
3. To provide information to persons or duly authorized agencies that assess **CastlingFP's** compliance with industry standards and **CastlingFP's** attorneys, accountants and auditors.
4. To law enforcement and state or federal regulatory agencies, self-regulatory organizations (where required), or where relating to a public safety matter.
5. To comply with federal, state or local laws; to comply with an authorized civil, criminal, or regulatory investigation, subpoena or summons by federal, state or local authorities; to respond to judicial process or regulatory authority having jurisdiction over **CastlingFP** for compliance or other purposes, as authorized by law.

How we Protect Your Personal Information

CastlingFP restricts access to consumer information to only authorized personnel who need to know the information in order to do their jobs. Physical, electronic and procedural controls are in place to protect access to all of **CastlingFP's** data.

How to Request More Information Regarding Our Privacy Policy

We value our relationship with every consumer. Part of that relationship is an openness to answer any questions you may have, concerning privacy policies and procedures which you may feel have not been answered in this notice. We welcome your feedback. Please contact us at:

Mailing Address:**Castling Financial Planning, Ltd.**

1337 Hunters Ridge East
Hoffman Estates, IL 60192

Office Hours by Appointment Only

Telephone:

224.353.8567

Email:

henry@YourIndependentAdviser.com

Disclosures and Disclaimer

All investments involve risk, including risk of loss of principal.

Castling Financial Planning, Ltd. does not provide any investment or financial advice without performing analysis of a client's situation and goals. Anything less is, at best, a sales presentation.

Castling Financial Planning, Ltd. is an hourly, fee-only financial planning practice and investment adviser, registered in the State of Illinois.

Castling Financial Planning, Ltd. operates elsewhere, where permitted by state law, based upon the National De Minimus provision to the Investment Advisers Act of 1940.

Castling Financial Planning, Ltd. believes strongly in the concept of independent, fact based advice, which is not tainted by conflicts of interest. As a result, we do not sell any financial products, nor seek affiliations with any broker/dealers or other financial product providers.

Castling Financial Planning, Ltd. is not in the business of providing legal or tax advice. Please consult with your attorney or qualified tax professional, for legal and tax advice specific to your personal situation.

Castling Financial Planning, Ltd. is not responsible for events beyond its control, such as wars, strikes, natural disasters, terrorist acts and market fluctuations.

This disclaimer does not seek to waive, limit or minimize any rights a consumer may have under applicable state or federal laws.