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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 may obtain the following public and non-public information about our clients:

- Personal data for you and your immediate family members such as name, address, 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, home appraisal 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 for current and prior financial accounts (e.g., for investments transferred). This can include account activity, balances, and similar data.
- Information regarding securities transactions effected by us.

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.
  - o 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 protect non-public information from unauthorized access. These include, but are not limited to, the following:
  - Our office is locked at all times (except when we are expecting clients for scheduled appointments).
  - Paper documents are kept to a minimum. We scan paper documents to PDFs and return originals to clients.
  - All office workstations (including those storing client information) are password protected, trusted platform module (TPM) enabled, and encrypted requiring a physical startup key.
  - Hardware and software passwords are changed periodically.
  - Workstations are backed up periodically both to the cloud and to an electronic storage device which is kept offsite. All backups are encrypted.
  - Email that contains personally identifiable information in the text or attachments will be sent via an encryption tool, except upon specific client request otherwise.
  - o Client data is not stored on personal smart phones or tablet devices.
  - Remote access to office workstations is accomplished using software employing SSL/TLS communications protocol.
  - o Internet browser data is regularly removed from workstations.
- Employees will have access to information only to the extent necessary to perform their duties.

### **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.

## **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 change the Privacy Policy.