



STRATEGIC FINANCIAL PLANNING, INC.

Navigating Your Life Journey™

TO: All Advisory Clients
FROM: Strategic Financial Planning, Inc. (hereinafter referred to as "SFP")
DATE: April 16th, 2018

SUBJECT: **PRIVACY NOTICE**

Our firm is committed to safeguarding the confidential information of our clients. We hold all personal data provided to us in the strictest confidence. The information we compile includes that provided by you on our questionnaires, collected from your previous advisors, if any, and from statements and other sources that you give us. "Nonpublic personal information" is nonpublic information about you that we obtain in connection with providing a financial service to you.

We have never disclosed information to nonaffiliated third parties, except as required by law, or in carrying out the duties for which you retained us. We do not anticipate any change to this policy, and in the unlikely event that we were to change it, we will contact you prior to such a change and give you the option to protect your data.

As you know, we use health and financial information that you give us to assist you in meeting your personal financial goals while guarding against any perceived or real infringements of your privacy rights. Our policy with respect to personal information is as follows:

- ◆ We limit access to information to only those employees who have a business or professional reason for knowing it, and only to nonaffiliated parties as permitted or required by law – for example, federal regulations permit us to share a limited amount of information with custodians in order to transact business on your behalf, and federal and state regulators, in the course of inspecting us may also have access to your data.
- ◆ We maintain a secure physical office and our computers are protected by security firewalls to ensure that your information is not placed at unreasonable risk.
- ◆ For unaffiliated third parties that require access to your personal information (such as a custodian or strategic alliance) we also require strict confidentiality under their policies and expect them to keep this information private.
- ◆ If we receive a wire transfer request through electronic communication, we will confirm the request over the phone with you in order to reduce the risk of identity fraud.
- ◆ If you prefer that we not disclose nonpublic personal information about you to nonaffiliated third parties and strategic alliances in carrying out our duties and services, you may opt-out of those disclosures, that is, you may direct us not to make those disclosures (other than those disclosures permitted by law). To opt-out you may call us at 972-403-1234.
- ◆ We do not provide your personal information to mailing list vendors or solicitors for any purpose.
- ◆ Disclosure of private client information is an offense subjecting employees to termination.
- ◆ We will maintain your files, with your data, as long as you are a client, and for as long thereafter as may be required by law and the CFP Board Code of Ethics and Professional Responsibility. After this required period of retention, all such information will be appropriately destroyed. Nonpublic personal information of former clients will be disclosed to nonaffiliated third parties only as required by law or as authorized by client.

SFP may disclose the client's information if SFP: (1) is previously authorized to disclose the information to individuals and/or entities not affiliated with SFP, including, but not limited to the client's other professional advisors and/or service providers (i.e., attorney, accountant, insurance agent, investment adviser, account custodian, etc.); (2) deems necessary to obtain specific information, services or products from strategic alliances (3) is required to do so by judicial or regulatory process; or (4) is otherwise permitted to do so in accordance with the parameters of applicable federal and/or state privacy regulations or (5) the use of third parties to aid in the development and end-services provided to the client. This may include any and all services such as financial plan development, investment research, completion of client applications and other administrative duties, etc.

While none of this is new for us, under federal legislation, the Graham-Leach-Bliley Act, requires that we communicate our policies in writing to you. If more questions have been raised than answered, please let us know and we will do our best to satisfy your curiosity.