

## **Policy on Privacy, Security, and Confidentiality**

### *Your Privacy Is Protected*

At First Affirmative, we are committed to maintaining the confidentiality of all financial information specific to clients. We do not sell client information, and we do not disclose such information except as permitted or required by law, or as described below. The law allows you to “opt out” of certain types of information sharing with third parties. Our policy automatically opts you out.

Personal information collected may include name and address, Social Security number or tax identification number, bank information, date of birth, and other confidential information that may be pertinent to the development of a financial plan and/or an Investment Policy Statement. Other information about clients maintained by First Affirmative includes investment activity and goals, account balances, transaction history, income, assets, and fees paid. Such information is distributed to you in your quarterly performance report. Some of this information also appears on your quarterly Statement of Management Fees.

Client privacy is deemed to extend to the household (adults, whether related by marriage or not, residing at the same address). Information about assets not held jointly can only be shared with the non-owning household member after consent of the owner is given. For example, a married couple with a joint account and two individual IRA accounts must each formally consent to First Affirmative sending information or discussing the IRAs with the non-owner party. This consent includes discussion and implementation of management fee calculations and any lower fee rates applicable due to the aggregation of accounts for the purpose of achieving fee schedule breakpoints, periodic performance reports, and other communications.

There are several types of relationships that make up a household covered by this policy. These types include: 1) husband / wife; 2) unmarried cohabitants; 3) blended families; and 4) siblings grouped for breakpoints. Each relationship type must sign a Client Agreement to open an account with First Affirmative. Privacy issues are discussed in the Client Agreement and all signatories to the agreement understand that by signing they have granted First Affirmative consent to share private information (as described above) with other members of the household.

Any adult in the household who is unwilling to grant the consent described above must enter into a separate agreement with First Affirmative and, thereby, waive any right to the aggregation of account assets for the purpose of achieving lower fee rate breakpoints. First Affirmative and our custodians require information obtained from a government issued photo identification document. As prescribed by law, we perform a search to ensure that client names do not appear on any “suspicious activity list.” We perform this test when new account paperwork is received and monthly thereafter. We do not use the services of any Credit Reporting Agency.

The information is used in providing the services clients contract with us to deliver. We share certain personal, confidential information outside the company only as specified below:

- a. Administrative service providers, custodians, and broker-dealers that are executing transactions.
- b. Third-party money managers hired to manage client accounts.
- c. First Affirmative's attorneys and accountants.
- d. Any Federal or State Regulatory Agency, as needed, or as otherwise prescribed by law or court order.

Information about former clients is shared and discussed only with company accountants and attorneys, or with Federal or a State Regulatory Agency, as necessary, or as required by law, or by court order.

All First Affirmative authorized personnel have signed a Non-Disclosure Agreement. Only those staff members or designated independent contractors that must have access to client information have the means to view such information.

We employ safeguards to protect our electronic files containing client information from outside access. We will not send client information via e-mail without encryption or security designed to allow no one but the intended recipient to access the information.

First Affirmative provides this notification of our Policy on Privacy, Security, and Confidentiality to every client, and we send a new copy to every client annually.