



## PRIVACY NOTICE

**Maintaining the trust and confidence of our clients is a high priority. That is why we want you to understand how we protect your privacy when we collect and use information about you, and the steps that we take to safeguard that information. This notice is provided to you on behalf of Freedom Partners LLC ("Freedom Partners").**

**Information We Collect:** In connection with our services, Freedom Partners obtains non-public personal information about you and your clients, including:

- Information received from you or your clients on account applications, such as address, date of birth, Social Security Number, occupation, financial goals, assets and income;
- Information about your or your clients' transactions with Freedom Partners, our affiliates, or others;
- Information regarding, ownership, revenue, profitability, debts, assets, liabilities, taxes, inventory, general depreciation, cash flow, fixed assets, accounts receivable, net worth and business relationships;
- Company profiles and statistics, including number of employees, salary information, benefits information, positions, and your company's management, such as the educational and career histories of company principals;
- Information regarding real estate owned or leased by the company;
- Information about insurance coverage and risk management planning;
- Information regarding company's intellectual property (e.g. types of patents, trademarks).

**Categories of Information We Disclose:** Freedom Partners may only disclose information collected in accordance with this policy. Freedom Partners does not sell customer lists and will not sell your name or your clients' name to telemarketers.

**Categories of Parties to Whom We Disclose:** Freedom Partners will not disclose information regarding you or your affiliation with Freedom Partners, except under the following circumstances:

- To entities that perform services for Freedom Partners or function on its behalf,
- To consumer reporting agencies,
- To third parties who perform services or marketing, client resource management or other parties to help manage your account on our behalf;
- To your attorney, trustee or anyone else who represents you in a fiduciary capacity;
- To our attorneys, accountants or auditors; and
- To government entities or other third parties in response to subpoenas or other legal process as required by law or to comply with regulatory inquiries.

**How We Use Information:** Information may be used among companies that perform support services for Freedom Partners, such as data processors, relationship management technology, technical systems consultants and programmers, or companies that help us market services to you for a number of purposes, such as:

- To protect non-public information from unauthorized access or identity theft;
- To provide service to your account in accordance with your Service Agreement;
- To comply with Federal and State requirements;
- To keep you informed about services of interest to you.

**Our Security Policy:** Freedom Partners restricts access to nonpublic personal information about you to those who need to know that information to provide services to you and perform their respective duties. Freedom Partners maintains physical, electronic, and procedural security measures to safeguard confidential client information.

**Succession Planning:** In the event that the owner(s) of Freedom Partners retire, become incapacitated or perish unexpectedly, your information would be disclosed to an unaffiliated third party for the purposes of facilitating a business succession plan. A change in control of ownership of Freedom Partners would require your consent, as dictated by your Service Agreement with Freedom Partners, in order to continue providing services to you.

**Your Right to Opt Out:** Federal privacy laws give you the right to restrict some sharing of your personal financial information. These laws balance your right to privacy with Freedom Partners' need to provide information for normal business purposes. You have the right to opt out of some information sharing with companies that are (1) Part of the same corporate group as your financial company (or affiliates); or (2) Not part of the same corporate group as your financial company (or non-affiliates). Choosing to restrict the sharing of our personal financial information will not apply to (1) Information about you to firms that help promote and market the company's own products or products offered under a joint agreement between two financial companies; (2) Records of your transactions--such as your loan payments, credit card or debit card purchases, and checking and savings account statements--to firms that provide data processing and mailing services for your company; (3) Information about you in response to a court order; and (4) Your payment history on loans and credit cards to credit bureaus. If you opt out, you limit the extent to which Freedom Partners can provide your personal financial information to non-affiliates.

**Complaint Notification:** Please direct complaints to: Ryan Delaney at Freedom Partners LLC via email.

**Changes to This Privacy Policy:** If we make any substantial changes in the way we use or disseminate confidential information, we will notify you. If you have any questions concerning this Privacy Policy, please contact us at: Freedom Partners LLC via email.