

## Policy on Privacy, Security and Confidentiality

First Affirmative Financial Network, LLC (“First Affirmative”) has an obligation to all Clients to treat their accounts and the information provided to open those accounts with the utmost care. The following measures have been put in place to ensure that privacy, security and confidentiality are not breached by outside access or unauthorized personnel.

### Organization-Collected Information

A government issued identification document is required to be submitted with new account paperwork. Using the information obtained from this document, First Affirmative performs a search to ensure that the Client’s name is not on any “suspicious activity list.” We perform this test on all current Clients on a monthly basis. We do not obtain Client information from any sources other than the Client and the Adviser with whom the Client has a working relationship. We do not use the services of a Credit Reporting Agency or any other outside organization

### Disclosed Information

We request a variety of informational data from each Client in order to determine the financial need, risk tolerance, and social concerns of the Client. This information includes but is not limited to the Client’s annual income, net worth, investment assets, goals and objectives, and other information that may be pertinent to the development of an Investment Policy Statement. The adviser may also develop investment plans and strategies for the Client based on this information.

### Parties with Whom Information Is Shared, Including Non-Affiliated Service Providers

Client information may be shared with the following parties:

- a. First Affirmative officers and home office staff as necessary in the day-to-day management of the company and in providing Client services.
- b. Third-party money managers based on completion of a Confidential Client Questionnaire that results in a Proposal which includes allocations to separate account managers or model portfolio managers, if the Client approves the Proposed asset allocation strategy.
- c. First Affirmative’s attorneys and accountants in the course of their review of our business.
- d. Any Federal or State Regulatory Agency in the course of their review of our business practices or as otherwise prescribed by law or court order.
- e. Custodians of Client accounts, including Charles Schwab & Co., Inc., Foliofn, Inc. and other authorized custodians that may be used in the future. The custodians of Client accounts only receive personal information about Clients from the account application that Clients complete and sign.

Client information may also be shared with an outside reporting service, if approved by the Client prior to opening the account.

## Information About Former Clients

Information provided by a Client who is no longer using First Affirmative's services is shared as above only with First Affirmative attorneys and accountants or any Federal or State Regulatory Agency, or as otherwise prescribed by law or court order.

## Policies and Procedures

1. Client information is provided to First Affirmative via a Confidential Client Questionnaire and/or the account applications completed by the Client with the assistance of their Adviser. First Affirmative discloses its policy is for sharing Client information with others in this Policy on Privacy, Security and Confidentiality as well as in each Investment Advisory Services Agreement as follows:

*Any information and documents provided to First Affirmative about you, the Client, your family, your financial circumstances, and your financial objectives will be kept strictly confidential, except as to First Affirmative's attorneys and accountants who may need to review our files (they must keep the information confidential) and insofar as we may be required by law or regulation to disclose such information to federal and state regulatory authorities, or as may be required by court order. First Affirmative does not sell or rent mailing lists and will not release your name and address to anyone outside of First Affirmative without your permission. The Client has been provided a copy of First Affirmative's Privacy Policy which discloses our confidentiality guidelines in more detail. The Client is encouraged to read this information before entering into this agreement. The Client's signature on this agreement acknowledges receipt of this information.*

2. First Affirmative restricts access to our physical and electronic files to authorized personnel only—First Affirmative home office staff and our Designated Independent Contractors (i.e. the Client's financial adviser). All of our authorized personnel have signed a "Confidentiality Agreement" which is kept on file in the home office. Only those staff members or Designated Independent Contractors that must have access to personal Client information have the means to view that information.
3. First Affirmative may provide information regarding a Client's account to non-affiliated financial services companies with whom we have a sub-adviser agreement, in order to provide the Client with that financial company's services with relation to their account (e.g. Clarke Lanzen Skalla for the Dynamics program). First Affirmative will also provide information to Solicitors or Advisers about the Clients they bring to First Affirmative to participate in our investment programs and services. A valid Selling Agreement or Solicitor's Agreement with the Broker/Dealer or Registered Investment Advisory firm is required before any Client information is provided between parties.
4. We do not obtain personal Client information from sources other than those mentioned above.
5. We have safeguards to protect our electronic files containing Client information from outside access.
6. First Affirmative, and its representatives, will provide an initial notification of our Privacy, Security and Confidentiality Policy to every Client. We send new copies of this Policy Statement to all Clients annually.

## Right to Opt Out

The law allows you the right to "opt out" of certain types of information sharing with third parties. First Affirmative does not share personal information about you with any third parties that triggers this opt out provision. This means that you are ALREADY OPTED OUT. We only share personal information with third parties as described above.