Privacy Policy Statement

Commencement Financial Planning, LLC, an independent financial planning firm, is committed to safeguarding the confidential information of its clients. We hold all personal information provided to our firm in the strictest confidence. These records include all personal information that we collect from you in connection with any of the services provided by Commencement Financial Planning, LLC. We only share your information when we are required by law or in the process of providing services to you. This also applies to any information we collect about you from other sources. If we were to anticipate a change in firm policy, we would be prohibited under the law from doing so without advising you first.

What information do we collect?

- Information we receive from you on applications, estate planning documents, insurance declarations, tax returns, questionnaires, and other financial documents. This includes information such as your name, address, social security number, birthdate, investment assets, liabilities, etc.
- Information about your financial transactions such as deposits, withdrawals, positions, tax basis, trades, investment income, etc.

Do we disclose your personal information to third parties?
We do not disclose any nonpublic personal information about our current or former clients to anyone except for the following reasons:

- As required by law. If disclosure is required under law, we will in good faith report personal information (i.e., to regulators or law enforcement authorities).
- We may disclose certain personal information we collect to non-affiliated third parties in order to provide services to you. These non-affiliated third parties are:
    - Microsoft Office 365 – Used to store, sync, and share files online so they're always up to date. This also allows access across devices to create, edit, and share electronic files anytime, anywhere. Visit: http://www.trustoffice365.com/
    - Carbonite – In 2005 Carbonite pioneered the idea of online backup. To date, they've backed up more than more than 300 billion files and every day back up more than 350 million files. Visit: http://www.carbonite.com/terms-of-use/privacy
    - MoneyGuidePro – PIEtech is dedicated to one thing - helping advisors use financial planning to more effectively motivate each client to create, implement and maintain an investment strategy that best meets their lifetime financial goals. Visit: https://www.moneyguidepro.com/home/privacy
    - Blueleaf –Blueleaf simplifies the aggregating, tracking, monitoring, and measuring the performance of investment portfolios. It is extremely safe as it only has a reporting function as does not collect sensitive personal information such as birthdays or social security numbers. Visit: http://www.blueleaf.com/privacy-policy/
    - Schwab Advisor Services – Charles Schwab is the custodian for most of our client investment assets, and is one of the nation's leading providers of financial services. Schwab Advisor Services, a subsidiary of Charles Schwab, provides securities brokerage, banking, money management, and other financial services to independent investment advisors. Visit: http://www.schwab.com/public/schwab/nn/legal_compliance/privacy
    - Maximize My Social Security - A simple, but comprehensive tool designed to help you (whether you are married, divorced, widowed, or single) get the highest benefits from Social Security. Visit: https://maximizemysocialsecurity.com/customer-service-policy

Privacy Policy Statement (cont'd)

Do we sell your personal information?
No. We do not sell the personal information we have collected about you to anyone.

How do we protect your information?
We use health and financial information that you provide to us to help you meet your personal financial goals while guarding against any real or perceived infringements of your rights of privacy. Our policy with respect to personal information about you is listed below.

- We limit employee and agent access to information only to those who have a business or professional reason for knowing, and only to nonaffiliated parties with your permission or as required by law.
- We maintain a secure office, and secure computer environment to ensure that your information is not placed at unreasonable risk.
- For unaffiliated third parties that require access to your personal information, including financial service companies, consultants, and auditors, we also require strict confidentiality in our agreements with them and expect them to keep this information private. Federal and state regulators also may review firm records as permitted by law.
- We do not provide your personally identifiable information to mailing list vendors or solicitors for any purpose.
- With your permission we may disclose your personal information to your other service providers such as your CPA and/or attorney.
- Personally identifiable information about you will be maintained during the time you are a client, and for the required time thereafter that such records are required to be maintained by federal and state securities laws, and consistent with the CFP Board of Ethics and Professional Responsibility. After this required period of record retention, all such information will be destroyed.