### **Privacy Policy**



We appreciate your business and the trust you have placed in us. Our privacy philosophy reflects the value of your trust. We are committed to protecting the personal data we obtain about you. Please know that we do not sell your personal data. In order to provide services or products to you, we may use your personal data. To further understand our Privacy Policy, please review the following details.

#### WHAT PERSONAL DATA WE MAY COLLECT ABOUT YOU?

We may collect your personal data to provide you with the products or services you requested. We may obtain it from your application, your transactions with us, and outside parties such as consumer reporting agencies. We may collect personal data about you to process transactions and to prevent fraud. Where required, we will obtain your consent before collecting it. The personal data may include:

- Name, address and other personal information
- Income and assets
- Accounts at other institutions
- Social security, driver's license, or taxpayer's identification number

#### WHAT WE DO WITH YOUR PERSONAL DATA?

We comply with Federal and State requirements related to the protection and use of your data. This means that we only share data where we are permitted or required to do so to provide services to you. We also may be required to obtain your authorization before disclosing certain types of personal data.

We may use your personal data in order to:

- Process transactions
- Respond to your requests
- Prevent fraud
- · Comply with regulatory requirements
- Share with you related products and services we offer

We do not sell personal data about current or former customers or their accounts. We do not share your personal data with any affiliates or outside companies for marketing purposes. When affiliates or outside companies perform a service on our behalf, we may share your personal data with them solely in connection with providing those services. We require them to protect your personal data, and we only permit them to use your personal data to perform these services.

Examples of outside parties who may receive your personal data are:

- Your financial advisor, bookkeeper, or other authorized agent(s)
- Your brokerage firm or custodian
- State or Federal authorities
- Other companies or service provider we use to provide services to you

#### HOW WE PROTECT YOUR PERSONAL DATA?

In order to protect your personal data we maintain physical, electronic and procedural safeguards.

Examples of these safeguards are:

- All employees sign a Confidentiality Agreement upon being employed.
- Each employee has a unique login and password for the network. Remote access is also kept secure with Multi-Factor Authentication using DUO.
- Network is protected by a Sonicwall Firewall monitored and maintained by Synergy ITS Solutions of NYS, our outsourced IT consultants.
- Any disposed paper documents are securely shredded onsite.
- Sophos Central Intercept X Advanced with XDR antivirus installed at individual computers and file server.
- Off-site backups are managed by Synergy ITS Solutions of NYS using Microsoft Azure Backup. Microsoft Azure Backup is a cloud-based backup solution that ensures secure data resiliency through automated backups, long-term retention, and built-in security features, helping businesses meet compliance and disaster recovery requirements. Data within Microsoft Azure Backup is encrypted at rest and in transit using AES-256 encryption via end-to-end encryption. Azure has immutable backups which prevents from deletion, whether accidental or malicious. Deleted backup data is also retained for an additional 14 days as an additional safeguard. Microsoft Azure Backup meets many compliance certification requirements such as GDPR, HIPAA, ISO 27001 and others.
- Emails containing personal data are sent, and received (via our website) utilizing a 256-bit Secure Sockets Layer (SSL) encryption program called ZixPort, a secure web-based portal from ZixCorp.
- Office is protected by a door activated/motion detected/fire 24/7 monitored security system.

#### OUR COMMITMENT TO KEEPING YOU INFORMED.

Our Privacy Policy is available online and by request. In the event we broaden our data sharing practices we will notify you of our new Privacy Policy.



# **Financial Planning Practice Standards**

Gathering the input of CFP® practitioners and other entities in a process that lasted nearly seven years, the Certified Financial Planner Board developed the Financial Planning Practice Standards.

These Practice Standards establish the level of professional practice that is expected of a CFP certificant who is engaged in personal financial planning. Organized into six series, each Practice Standard relates to one of the six steps in the financial planning process:

- 1. Establishing and defining the relationship with the client
- 2. Gathering client data
- 3. Analyzing and evaluating the client's financial status
- 4. Developing and presenting the financial planning recommendation(s)
- 5. Implementing the financial planning recommendation(s) and
- 6. Monitoring

The standards provide CFP practitioners with a framework for the professional practice of financial planning and help clients understand what they are reasonably entitled to expect during a financial planning engagement.

Practice Standards are for the ultimate benefit of consumers of financial planning services and are intended to assure that the practice of financial planning by CFP professionals is based on established norms of practice, to advance professionalism in financial planning and to enhance the value of the financial planning process.

Practice Standards apply to CFP certificants in performing the tasks of financial planning regardless of the person's title, job position, type of employment or method of compensation.

## **The Strebel Planning Group - A Team Approach**

The Strebel Planning Group is different. We are locally owned and completely independent. This means that we don't answer to a home office, don't have sales quotas that result in our recommending products that are not quite right for you, and have the ability to create client fulfillment processes in response to client's needs, not those of bureaucrats with no understanding of our community.

Throughout your relationship with our firm, you will interact with various members of our <u>team</u>. Our extremely low employee turnover enables us to further enhance your service, as the names and faces become familiar to you and rarely change. Our staff enjoys our living wage policies, paid volunteer time, flex time, work at home options, and a dedication to a working physical and emotional environment that makes for happy employees. And, who doesn't want to work with folks that enjoy their work?

Our friendly and collaborative staff feel right at home in the beautifully restored Greek Revival Farmhouse we are fortunate to work in each day. We look forward to welcoming you, and know you will enjoy working with the people here at the Strebel Planning Group.