

### **Our Commitment to Privacy**

The relationship between Over Coffee Financial and our clients is our most important asset. We strive to maintain your trust and confidence in our firm, an essential aspect of which is our commitment to protect the confidentiality, integrity and security of your personal information. As we believe that all of our clients value their privacy, we do not disclose your personal information to anyone unless it is required by law, or at your direction. We do not sell your personal information to anyone.

Over Coffee Financial will always obtain a signed statement from you declaring that you allow us to share confidential information with non-affiliated third parties; however we will not ask for this unless it is an important aspect of the services you have paid us for. This is to protect you from unsolicited marketing efforts, which Over Coffee Financial does not and will never participate in. Therefore, we do not require your 'opt-in' signature. We will only share confidential information if it is at your direction, in response to resolving an inquiry made by you, or in the service of your account.

### **Personal Information That We Collect, Maintain, and Communicate**

We collect personal information so we can provide investment management and financial planning services to you. The types and categories of information we collect and maintain about you include:

- Information we receive from you to open an account or provide investment management/financial planning services to you (such as your date of birth, social security number, address, telephone number, and financial information);
- Information about your transactions with us, our affiliates, or others to service your account (such as trade tickets and account statements);
- Information that we receive from third parties with respect to your account (such as trade confirmations from brokerage firms).

In order for us to provide investment management and financial planning services to you, we may disclose personal information that we collect and maintain in very limited instances, which includes:

- Disclosures that are authorized or requested by you (for example, to receive an insurance quote, providing information such as age or health conditions);
- Disclosures that are required by law (for example to cooperate with regulators or law enforcement authorities);
- Disclosures to companies as otherwise permitted by law, including those necessary to service your account (such as providing account information to brokers or custodians).

### **How We Protect Your Personal Information**

To fulfill our privacy commitment, we have instituted practices to safeguard the information that we maintain about you. These include:

- Maintaining physical, electronic and procedural safeguards that comply with federal and state regulations to guard your personal information;
- Limiting access to personal information to employees and third parties that are necessary or appropriate to provide services to you;
- Requiring third parties that perform services to us to agree by contract to keep your information strictly confidential;
- Protecting information of our former clients to the same extent as our current clients.