



Privacy Notice

In order for Homestead Financial Management, LLC ("the Provider") to perform its daily money management services it generally must collect, use and sometimes disclose the Clients' personally identifiable information ("PII"), protected health information ("PHI") and financial information ("FI").

Personally Identifiable Information

PII is data used to distinguish one's identity. Examples of PII range from an individual's name or email address to an individual's financial and medical records and/or criminal history. Unauthorized access, use, or disclosure of PII can seriously harm individuals, by enabling the opportunity for identity theft, blackmail, or embarrassment. It is the Provider's policy that the following information received from any client be maintained and protected as PII:

- Client names and addresses
- Email addresses
- Social security numbers, tax identification numbers
- Dates and places of birth
- Credit card and bank account numbers
- Income tax records
- Insurance records
- Account access, PIN numbers and passwords
- Driver's license numbers.

Protected Health Information

PHI is individually identifiable health information, which is any information that identifies an individual and relates to the individual's: past, present or future physical or mental health or condition. Storage, access, use and disclosure of PHI is regulated by state and/or federal law, including the Health Insurance Portability and Accountability Act ("HIPAA"). Examples of PHI range from an individual's medical condition to treatment by physicians and hospitals including:

- Explanation Of Benefits (EOB)
- Hospital and doctor records
- Medical bills and statements

Financial Information

Financial information is any information or documents collected from a client that relates to their banking, insurance, payments (including credit cards, online payment systems such as apps accessible via phone, invoices), and investments.

Examples of FI include the following:

- Bank records and statements
- Insurance policies
- Investment and brokerage records and statements
- Credit card, online payment information
- Credit and loan records and information
- Tax records and information
- Bills, invoices and statements

Use Of Information

The Provider acts to maintain the privacy of PII, PHI and FI and provides individuals with notice of our legal duties and privacy practices with respect to PII, PHI and FI described herein and abides by the terms of this same notice. The Provider provides this notice to every client to whom it has a direct business relationship constituted by a written Engagement letter between a client and the Provider. The Provider reasonably ensures that the PII, PHI, FI and any other information it requests, uses and discloses for any purpose is the minimum amount of PII, PHI and FI in order to fulfill the objectives set forth in the Engagement Letter. To achieve such objectives, the Provider may use such PII, PHI and FI in third-party software such as Quicken, QuickBooks, financial based institution web-based record and bill pay software, and / or store and maintain such PII, PHI and FI electronically on password or biometric protected computers, devices or cloud storage servers provided by third-party service providers.

Data Security

The Provider will take reasonable precautions to protect PII, PHI and FI and documents collected from you, from loss, misuse and unauthorized access, disclosure, alteration, and destruction. All information that you provide to us either in paper or electronic form is securely stored and protected. Transactions initiated by the Provider will be encrypted or utilize tools that ensure safe transfer of information and data. However, these measures, standing alone, are not sufficient to ensure the security of your information. We cannot guarantee the security of your data transmitted to us without using encryption or other secure ways to transmit data, thus any transmission is at your own risk. It is also important for you to guard against unauthorized access to your passwords and the unauthorized use of your computer.

Information Disclosures

The Provider discloses PHI regarding victims of abuse, neglect or domestic violence. The Provider discloses PHI about disabled adult, nursing home

resident, or person over 60 years of age whom the Provider reasonably believes to be a victim of abuse or neglect to the appropriate authorities as required by law or, if not required by law, if the individual agrees to the disclosure. This includes elder abuse and exploitation, abused and neglected nursing home residents, or disabled adults abuse.

The Provider discloses PII, PHI and FI for judicial and administrative proceedings in response to an order of a court or an administrative tribunal; or a subpoena, discovery request or other lawful process, not accompanied by a court order of an ordered administrative tribunal. The Provider discloses PII, PHI and FI for law enforcement purposes to law enforcement officials and to public health or other authorities required by law. The Provider does not use or disclose any PII, PHI and FI for marketing purposes.

We may collect basic user profile information from all our website Visitors. We collect the following additional information from our Authorized Customers: the names, addresses, phone numbers and email addresses of Authorized Customers. This information collected is used exclusively by Homestead Financial Management, LLC and is not sold to or used by any third parties.

Changes To Privacy Policy

We reserve the right, at any time and without prior notice, to add to, update, or modify this Privacy Policy. We will notify you by providing a and sending you a notification by email.