

## PRIVACY POLICY & PRACTICES

Michael A. Langlois, MBA, CFP®

d/b/a Strategic Financial Group

Strategic Financial Group collects personal information about you to help us serve your financial needs, process transactions in your account, provide customer service, offer new products or services, and fulfill legal and regulatory requirements.

### **Gathering Information**

The Advisor collects non-public personal information from you as well as other sources. The sources and the information collected may include:

- Information you provide to us, to our affiliated entities or to your advisor on applications and related forms, through discussion with our staff or on our website such as address, social security number, birth date, net worth, assets, income and medical information.
- Information regarding your transaction history with us such as products or services purchased, account balances, trading history and payment history, as well as information from information service companies and consumer reporting agencies, such as your transactions or credit relationships with unaffiliated third parties
- Information from other unaffiliated third parties, including employers, associations, benefit plan sponsors and other institutions, if you transfer positions or funds to Strategic Financial Group such as name, address, social security number, assets and income.

### **Sharing Information**

We may discuss any non-public personal information that we collect about you as required to conduct our business and as permitted or required by law. We may share information about our clients with our affiliated insurance company and/or with unaffiliated financial or non-financial service providers, such as insurance companies, broker/dealers, investment advisors, mutual fund companies, banks, investment firms, third-party administrators, clearing firms, retirement plan sponsors and other third parties who assist us in obtaining business or providing account maintenance or customer service to your account(s). In addition, we may share some or all the information we collect with other financial institutions with whom we have joint marketing agreements. Furthermore, we also may share your information with auditors, regulators and law enforcement organizations or in response to a subpoena or discovery request, as permitted or required by law.

***We do not sell, share or disclose your non-public information to unaffiliated third-party marketing companies.***

If the advisor servicing your account leaves Strategic Financial Group to join another financial institution, the advisor may retain copies of your personal information so he or she can continue to serve you at their new firm. In doing so, your advisor may share your information with the new firm but is otherwise required to keep confidential the personal information obtained from you while the advisor was affiliated with Strategic Financial Group and he or she may only use it to service your account(s).

### **Opting in**

If you live in an “opt-in” state where we are required to obtain your affirmative consent to share your non-public personal information with unaffiliated third-parties who do not currently assist us in servicing your account(s) or conducting our business, your advisor is required to obtain your consent before your advisor may take your information with him or her should your advisor leave Strategic Financial Group.

**Note:** You can withdraw your consent at any time, by contacting us at **(401)463-3150**

### **Opting out**

If you live in an “opt-out” state and do not want your advisor to take your personal financial information with him or her should your advisor decide to leave Strategic Financial Group in the future, you have the right to opt-out of such disclosure. If you have a joint account, we will treat an opt-out direction by a joint customer as applying to all associated joint customers. If you wish to opt-out, now or at any time in the future, please complete the form below or contact us at **(401)463-3150**.

### **Cookies**

Cookies are very small files placed onto the hard drive of your computer the first time you visit our website which enables our servers to recognize who you are the next time you visit our site. Contrary to popular belief, cookies do not extract private or personal information from your computer’s memory, rather they record only information relating to your visit to our site. Strategic Financial Group uses cookies to track usage of the website and to address security issues. We may also use cookies to store your preferences relating to the use of our website. If you do not want to allow our website to place a cookie on your computer, you can change your browser’s settings to deny cookies, however, this may affect your experience with certain features of our website.

### **Safeguarding Your Privacy**

Strategic Financial Group recognizes the need to prevent unauthorized access to the information we collect, including information held in electronic format. Strategic Financial Group authorizes access to your non-public personal information only to the parties with whom we have executed confidentiality/ nondisclosure agreements and who need that information to serve you or assist us in conducting our operations. We maintain physical, electronic, procedural and contractual safeguards regarding your non-public personal information to ensure that we comply with our own policy, industry practices, and federal and state regulations. Strategic Financial Group trains its employees in the proper handling of sensitive information. If you decide to close your account(s) or become an inactive customer, we will adhere to the privacy policies and practices as described in this notice.

### **Questions**

You do not have to contact us to benefit from our privacy protections. They apply automatically to all our customers and former customers. If you have any questions after reading this privacy policy, we encourage you to contact us at **(401)463-3150**.

**OPT-OUT FORM**

**Please note:** If you have a joint account, your choice will apply to everyone on your account unless you tell us otherwise.

\_\_\_\_\_ Apply my choices only to me

\_\_\_\_\_ I do not want my advisor to share my personal financial information with another financial institution if my advisor leaves Strategic Financial Group. I understand that my advisor may disclose my name, address, phone number, title of my account(s) and my e-mail address to my advisor's new firm.

NAME: \_\_\_\_\_

ADDRESS: \_\_\_\_\_

\_\_\_\_\_  
ACCOUNT NUMBER(s): \_\_\_\_\_

Mail to:

Strategic Financial Group

55 Bald Hill Road

Cranston, RI 02920