



Privacy Policy

SmartRetirement4Nurses® (“Adviser”) is a fully owned division of Cognis Retirement Group LLC, a State Registered Investment Adviser (RIA). As a fiduciary, we consider client privacy to be a fundamental aspect of our client relationships. We recognize that you expect us to protect the information you provide us and to use it responsibly. We are committed to maintaining the confidentiality, integrity, and security of our current, prospective, and former clients’ personal information. For those reasons, we have adopted and adhere to the following policy regarding the privacy of your nonpublic personal information and personally identifiable information (collectively “Nonpublic Personal Information”).

Information that We Collect

While serving you, we may collect, retain, and use your nonpublic personal information and personally identifiable information (collectively “Nonpublic Personal Information”), including your name, address, e-mail address, telephone numbers, Social Security Number, other information that permits us to contact or communicate with you, information about your financial situation including your employment or occupation, salary, assets, insurance and investment transactions, banking information, and other financial and tax information you may elect to supply to us.

How We Collect Information

We collect this Nonpublic Personal Information through various sources, including:

- *Information we receive from you on new account forms, fact-finding questionnaires, product and service applications, and other forms.*
- *Information we receive from you, in writing, electronically, through the telephone, or through our website, when you communicate with us or request information about our products and services.*
- *Your transactions with us, our affiliates, and those affiliated and unaffiliated product sponsors with whom we have selling agreements or other arrangements for the provision of services to you and whose products you own.*

Information that We Disclose

We do not sell, exchange, or disclose client information with outside organizations unless the third party is essential in administering our operations or except as required or permitted by law. No confidential information, whatever the source, regarding any customer or client, may be disclosed except under the following circumstances:

- Adviser reserves the right to disclose or report personal information where we believe in good faith that disclosure is required under law, to cooperate with regulators or law enforcement authorities.
- Adviser reserves the right to disclose information with other Adviser employees in connection with the Adviser's business and to non-affiliated third parties with whom the Adviser has a contractual agreement to jointly offer, endorse or sponsor a financial product or service; and to service and maintain customer accounts including effectuating a transaction. Examples of non-affiliated parties that we may share your Nonpublic Personal Information with include:
 - *Mutual fund companies, insurance companies, and other product sponsors to execute your investment and insurance purchases and sales and to allow for the servicing of your accounts.*
 - *Clearing Agencies or other broker/dealers through whom we clear and settle your securities transactions.*
 - *Companies providing account performance and/or reporting services on your accounts.*
 - *Third party asset managers with whom we have relationships for the management of customer accounts.*
 - *Banks and other financial institutions*
- Adviser may disclose information about client or client's account to a non-affiliated third party at client's written request.

Steps We Take to Protect Your Information

We maintain security policies and procedures reasonably designed to prevent unauthorized use or access to your Nonpublic Personal Information. In addition to your Registered Representative or Investment Advisor and his or her office, your information is available to employees for various business purposes, such as processing or servicing transactions, and those fulfilling compliance, legal, or audit functions.

Our computer systems utilize password protection to prevent access by unauthorized personnel, and we employ other physical, electronic, and procedural safeguards to ensure the protection of your Nonpublic Personal Information in accordance with state and federal privacy regulations.

Amendments to Our Privacy Policy

When we make material amendments to our Privacy Policy, we will post an appropriate notice on our website. In addition, we may send you an amended version of our Privacy Policy through the mail.