

Thrift Financial, Inc.

PRIVACY POLICY

Thrift Financial, Inc. requires that you provide current and accurate financial and personal information. Thrift Financial, Inc. will handle the information you have provided in a safe, secure manner. We are committed to protecting your privacy.

Safeguarding Customer Documents

The security of all client data is paramount. We never sell or share client information, except as noted below under "Sharing Nonpublic Personal and Financial Information." This confidentiality and security of client information include, but is not limited to, landline and mobile phone numbers, SMS information, email addresses, physical addresses, account balances, or information related to investments maintained on clients. Specifically, no mobile information will be shared with third parties or affiliates for marketing or promotional purposes. Thrift never shares or sells text messaging originator opt-in data and consent; this information will not be shared with third parties or affiliates. Further, prospective and former clients' personal information is treated the same as that of existing clients and is never sold or shared.

We collect non-public customer data through checklists, forms, written notations, and documentation that our customers provide for investment and consulting services. This information is maintained in secure files and never shared or sold to third parties or affiliates.

During regular business hours, access to customer records is monitored so that only approved users can access the files. When the company is not operating, customer records will be locked.

No individual who is not so authorized shall obtain or seek to obtain personal and financial customer information. No individual with authorization to access personal and financial customer information shall share that information in any manner without the specific consent of a firm principal. Failure to comply with Thrift Financial, Inc. procedures regarding customer and consumer privacy will result in disciplinary action and may lead to termination.

Sharing Nonpublic Personal and Financial Information

Thrift Financial, Inc., is committed to protecting and maintaining the privacy of its customers' and consumers' personal and financial information. Accordingly, Thrift Financial, Inc., will not share such information with any affiliated or nonaffiliated third party except:

- To complete a transaction in a customer account with a clearing firm, account custodian, or similar firm;
- To maintain or service a customer account.
- To resolve customer disputes or inquiries.
- With people acting in a fiduciary or representative capacity on behalf of the customer.
- With rating agencies, people assessing compliance with industry standards, or the firm's attorneys, accountants, and auditors.
- In connection with a sale or merger of Thrift Financial, Inc.'s business.
- To protect against or prevent actual or potential fraud, identity theft, unauthorized transactions, claims, or other liability.
- To comply with federal, state, or local laws, regulatory agencies, and other applicable legal requirements.
- In connection with a written agreement to provide investment management or advisory services, when the information is released to provide the products or services covered by the contract.
- When the customer instructs us to consent or under any other exceptions enumerated in the Pennsylvania Privacy of Consumer Financial Information code, California Information Privacy Act, and Massachusetts Standards for the Protection of Personal Information of Residents of the Commonwealth.

Opt-Out Provisions

Thrift Financial, Inc., does not share nonpublic personal and financial information with affiliated or unaffiliated third parties except under the above circumstances. Since sharing information under the circumstances noted above is necessary to service customer accounts or mandated by law, there is no allowance for clients to opt out or opt in when applicable.