

Privacy Policy – as of January 1, 2021

Financial Spyglass® (Financial Spyglass®) recognizes that our relationships with current and prospective clients are based on integrity and trust. We work hard to maintain your privacy and to preserve the private nature of our relationship with you. We place the highest value on the information you share with us. Financial Spyglass® will not disclose your personal information to anyone unless it is required by law or at your direction. We will not sell your personal information. Financial Spyglass® will provide this privacy statement to all clients annually.

We want our clients to understand what information we collect, how we use it, and how we protect your personal information.

Why We Collect Your Information. We gather information about you so that we can:

- Help design and implement the investment and planning related services we provide you; and
- Comply with the Federal and State laws and regulations that govern us.

What Information We Collect and Maintain. We may collect the following types of “nonpublic personal information” about you:

- Information from our initial meeting or subsequent consultations about your identity, such as your name, address, social security number, date of birth, and financial information.
- Information that we generate to service your financial needs.
- Information that we may receive from third parties with respect to your financial profile.

What Information We Disclose. We are permitted by law to disclose nonpublic information about you to unaffiliated third parties in certain circumstances. For example, in order for us to provide planning or investment management services to you, we may disclose your personal information in limited circumstances to various service providers, such as our clearing firm or independent contractors hired by Financial Spyglass®. Financial Spyglass® will not disclose any personal information about you or your account(s) unless one of the following conditions is met:

- We receive your prior written consent; or
- We have documentation that the recipient is your authorized representative; or
- We are required by law to disclose information to the recipient

Arrangements with companies or independent contractors not affiliated with Financial Spyglass® will be subject to confidentiality agreements.

How We Protect Your Personal Information. Privacy is important to Financial Spyglass®. We restrict and limit access to client information only to those who need to carry out their business functions. We educate employees about safeguarding client information and preventing its unauthorized access, disclosure, or use. Employees will be required to acknowledge their acceptance and understanding of the privacy policy in writing. We maintain physical, electronic, and procedural safeguards to protect your confidential personal information.