

Policy on Privacy, Security and Confidentiality

First Affirmative Financial Network, LLC (“First Affirmative”) has an obligation to all clients to treat their accounts and the information provided to open and maintain those accounts with the utmost care. The following measures have been established to ensure that privacy, security, and confidentiality are not breached by outside access or unauthorized personnel.

Organization-Collected Information

A government issued photo identification document is required to be submitted with new account paperwork. Using the information provided, First Affirmative performs a search to ensure that the client’s name is not on any “suspicious activity list.” We also perform this test on all current clients on a monthly basis. We do not obtain client information from any sources other than the client and the Advisor with whom the client has a working relationship. We do not use the services of a Credit Reporting Agency or any other outside organization.

Disclosed Information

We request a variety of informational data from each client in order to determine their financial needs, risk tolerance, and social concerns. This information includes but is not limited to the client’s annual income, net worth, investment assets, goals and objectives, and other information that may be pertinent to the development of an Investment Policy Statement. The advisor may also develop investment plans and strategies for the client based on this information.

Parties with Whom Information Is Shared, Including Non-Affiliated Service Providers

Client information may be shared with the following parties:

- a. First Affirmative officers and home office staff as necessary in the day-to-day management of the company and in providing client services.
- b. Third-party money managers based on completion of a Confidential Client Questionnaire that result in an approved Investment Policy Statement which includes allocations to separate account managers.
- c. First Affirmative’s attorneys and accountants in the course of their review of our business.
- d. Any Federal or State Regulatory Agency in the course of their review of our business practices or as otherwise prescribed by law or court order.
- e. Custodians of client accounts, including Charles Schwab & Co., Inc., Foliqfn Investments, Inc. and other authorized custodians that may be used in the future. The custodians of client accounts only receive personal information about clients from the account application that clients complete and sign.

Client information may be shared with an outside reporting service, if approved by the client prior to opening the account. Advisors may outsource some or all of the administrative services normally provided by in-office support staff. This outsourcing of administrative services will be disclosed to those clients involved.

Information About Former Clients

Information provided by a client who is no longer using First Affirmative’s services is shared as discussed above

only with First Affirmative attorneys and accountants, or any Federal or State Regulatory Agency, or as otherwise prescribed by law or court order.

Policies and Procedures

1. Client information is provided to First Affirmative via a Confidential Client Questionnaire and/or the account applications completed by the client with the assistance of their advisor. First Affirmative discloses that its policy for sharing client information with others in this Policy on Privacy, Security, and Confidentiality, as well as in each Investment Advisory Services Agreement, as follows:

Any information and documents provided to First Affirmative about you, the client, your family, your financial circumstances, and your financial objectives will be kept strictly confidential, except as to First Affirmative's attorneys and accountants who may need to review our files (they must keep the information confidential) and insofar as we may be required by law or regulation to disclose such information to federal and state regulatory authorities, or as may be required by court order. First Affirmative does not sell or rent mailing lists and will not release your name and address to anyone outside of First Affirmative without your permission. The client has been provided a copy of First Affirmative's Privacy Policy which discloses our confidentiality guidelines in more detail. The client is encouraged to read this information before entering into this agreement. The client's signature on this agreement acknowledges receipt of this information.

2. First Affirmative restricts access to our physical and electronic files to authorized personnel only—First Affirmative home office staff and our Designated Independent Contractors (i.e. the client's financial advisor). All of our authorized personnel have signed a "Confidentiality Agreement" which is kept on file in the home office. Only those staff members or Designated Independent Contractors that must have access to personal client information have the means to view that information.
3. First Affirmative may provide information regarding a client's account to non-affiliated financial services companies with whom we have a sub-advisory agreement, in order to provide the client with that company's services. First Affirmative will also provide information to Solicitors or Advisors about the clients they bring to First Affirmative to participate in our investment programs and services. A valid Selling Agreement or Solicitor's Agreement with the Broker/Dealer or Registered Investment Advisory firm is required before any client information is provided to any parties to such agreements.
4. We do not obtain personal client information from sources other than those mentioned above.
5. We have safeguards to protect our electronic files containing client information from outside access.
6. First Affirmative, and its representatives, will provide an initial notification of our Privacy, Security and Confidentiality Policy to every client. We send new copies of this Policy Statement to all clients annually.
7. First Affirmative, and our Designated Independent Contractors, will not send client information via email without encryption or security designed to allow no one but the intended recipient to access the information.

Right to Opt Out

The law allows clients the right to "opt out" of certain types of information sharing with third parties. First Affirmative does not share personal information about clients with any third parties that triggers this opt out provision. This means that you are ALREADY OPTED OUT. We only share personal information with third parties as described above.