



## Privacy Policy

SecondHalf Planning & Investment, LLC is an independent Registered Investment Advisor primarily offering Retirement Planning and Wealth Management services on a fiduciary, fee-only basis to individuals and couples in the second half of life (age 50+). We are committed to safeguarding the confidential information of our clients and prospective clients.

In providing advisory services to you, we collect certain public and nonpublic information about you. This may include but is not limited to:

- Your name, date of birth, and social security number
- Address and email address
- Account numbers, balances, and transactions
- Tax and estate details
- Insurance data and policy information

This information may come from sources such as account applications, investment policy statements, your transactions, written correspondence (including electronic) or verbal communications from you, your attorney or accountant.

We never sell your information. We never exchange or disclose your information with third parties for joint marketing purposes. We disclose only the minimum information necessary to those third parties that are essential in administering our operations, as otherwise required or permitted by law, or as you have authorized in writing. Examples of parties to which we may disclose your information include:

- Third-party custodian holding the investment accounts that you have hired us to manage.
- Provider of off-site, redundant backup of our electronic client and practice files.
- Provider of encrypted email communication services.
- Providers of financial planning, portfolio management, and related software (used in our practice) that host the software "in the cloud."
- Regulatory authorities if required.

Larry McClanahan is sole owner and operator of both SecondHalf Planning & Investment, LLC and McClanahan Tax & Advisory LLC. For efficiency purposes, the two separate businesses share certain computer equipment, software, and backup/archival processes. As such, that may constitute a *technical* sharing of your information between the businesses, but your information will not be used to offer services through McClanahan Tax without your authorization.

Finally, we maintain physical, procedural, and electronic safeguards to protect your confidential information.