



BENCHMARK FINANCIAL

Your Financial Life.
Integrated. Organized. Simplified.

Benchmark Financial Wealth Advisors, LLC

Privacy Policy

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Boca Raton, FL 33431

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www.benchmarkfinancial.info

Clientservices@benchmarkfinancial.info

12/11/2019

Investment advisers are required by law to inform their clients of their policies regarding privacy of client information. Federal law gives the customer the right to limit some but not all sharing of personal information. It also requires us to tell you how we collect, share, and protect your personal information.

WHO WE ARE

Benchmark Financial Wealth Advisors and its affiliates. (Collectively "Benchmark Financial"). Our affiliates include the following:

- DB Benchmark LLC, Benchmark Financial Group, LLC, Benchmark Insurance Advisors, LLC, Benchmark Financial Benefits, LLC & Risk Services and MP Holdings Group, LLC.

WHAT WE DO

Benchmark Financial will protect your personal information from unauthorized access and use. We use security measures that comply with federal law. These measures include computer safeguards, as well as secured files and buildings.

Our online environment uses security technologies, including layered security and access controls over personal information. For further information, please visit our website benchmarkfinancial.info or call us at 561-416-2992.

We collect your personal information, for example, when you:

- Open an account
- Enter into an investment advisory account
- Apply for insurance
- Tell us about your investment or retirement portfolio
- Seek advice about your investments
- Seek Financial Planning advice

We also collect your personal information from others such as credit bureaus, affiliates or other companies.

Federal law gives you the right to limit only:

- Sharing for affiliates' everyday business purposes—information about your creditworthiness
- Affiliates from using your information to market to you
- Sharing for non-affiliates to market to you

State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law. Your choices will apply to everyone on your account.

TYPES OF NONPUBLIC PERSONAL INFORMATION (NPI) WE COLLECT

While using our service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you ("Personal Data").

We collect nonpublic personal information about you that is either provided to us by you or obtained by us with your authorization. This can include but is not limited to: your First name and Last name, Email address, Phone number, Cookies and Usage Data, Social Security Number, Date of Birth, Banking Information, Financial Account Numbers and/or Balances, Transactions, Sources of Income.

INFORMATION COLLECTION AND USE

We use your data to provide and improve our service. By using our service, you agree to the collection and use of information in accordance with this policy.

We collect several different types of information for various purposes to provide and improve our service to you.

REASONS WE COULD SHARE YOUR PERSONAL INFORMATION

	Does BFWA Share?	Can You Limit This Sharing?
For our everyday business purposes, such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, auditors, examiners, or compliance reviews	Yes	No
For our marketing purposes to offer our products and services to you	No	We do not share
For joint marketing with other financial companies	No	No
For our affiliates' everyday business purposes—information about your transactions and experiences	No	We do not Share
For our affiliates' everyday business purposes—information about your creditworthiness	No	We do not share
For non-affiliates to market to you—for clients with accounts established with or report to credit bureaus representatives at banks or credit unions	No	We do not share
For non-affiliates to market to you—for clients with accounts established with <i>BFWA's</i> independent representatives * If your independent representative terminates his or her relationship with us and moves to another brokerage or investment advisory firm, we or your independent representative will only disclose your personal information to the new firm, upon your written authorization.	NO*	We do not Share

If you are a new customer, we may begin sharing your information on the day you sign our agreement. When you are no longer our customer, we will hold your information and share it as described in this notice, however, you can contact us at any time to inquire on how we may limit our sharing.

PERSONAL DATA

We may use your Personal Data to contact you with newsletters, marketing or promotional materials and other information that may be of interest to you. You may opt out of receiving any, or all, of these communications from us by following the unsubscribe link or instructions provided in any email we send or by contacting us.

USE OF DATA

Benchmark Financial Wealth Advisors LLC, and all affiliates, use the collected data for various purposes:

- To provide and maintain our service
- To notify you about changes to our service
- To allow you to participate in interactive features of our service when you choose to do so
- To provide customer support
- To detect, prevent and address technical issues
- To provide you with news and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about unless you have opted not to receive such information.

USAGE DATA

We may also collect information on how the service is accessed and used ("Usage Data"). This Usage Data may include information such as your computer's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

TRACKING COOKIES DATA

We use cookies and similar tracking technologies to track the activity on our service and hold certain information.

Cookies are files with small amounts of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyze our service.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our service.

Examples of Cookies we use:

- **Session Cookies.** We use Session Cookies to operate our service.
- **Preference Cookies.** We use Preference Cookies to remember your preferences and various settings.
- **Security Cookies.** We use Security Cookies for security purposes.

LEGAL BASIS FOR PROCESSING PERSONAL DATA UNDER GENERAL DATA PROTECTION REGULATION (GDPR)

If you are from the European Economic Area (EEA), Benchmark Financial Wealth Advisors LLC, and all affiliates, legal basis for collecting and using the personal information described in this Privacy Policy depends on the Personal Data we collect and the specific context in which we collect it.

Benchmark Financial Wealth Advisors LLC, and all affiliates, may process your Personal Data because:

- We need to perform agreed upon services.
- You have given us permission to do so
- The processing is in our legitimate interests and it's not overridden by your rights
- To comply with the law

RETENTION OF DATA

Benchmark Financial Wealth Advisors LLC, and all affiliates, will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

Benchmark Financial Wealth Advisors LLC, and all affiliates, will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our service, or we are legally obligated to retain this data for longer time periods.

TRANSFER OF DATA

Your information, including Personal Data, may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

If you are located outside the United States and choose to provide information to us, please note that we transfer the data, including Personal Data, to the United States and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

Benchmark Financial Wealth Advisors LLC, and all affiliates, will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

DISCLOSURE OF DATA

Disclosure for Law Enforcement

Under certain circumstances, Benchmark Financial Wealth Advisors LLC, and all affiliates, may be required to disclose your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

Legal Requirements

Benchmark Financial Wealth Advisors LLC, and all affiliates, may disclose your Personal Data in the good faith belief that such action is necessary to:

- To comply with a legal obligation
- To protect and defend the rights or property of Benchmark Financial Wealth Advisors LLC, and all affiliates
- To prevent or investigate possible wrongdoing in connection with the service
- To protect the personal safety of users of the service or the public
- To protect against legal liability

Security of Data

The security of your data is important to us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

"Do Not Track" Signals Under California Online Privacy Protection Act (CalOPPA)

We do not support Do Not Track ("DNT"). Do Not Track is a preference you can set in your web browser to inform websites that you do not want to be tracked. You can enable or disable Do Not Track by visiting the Preferences or Settings page of your web browser.

Your Data Protection Rights Under General Data Protection Regulation (GDPR)

If you are a resident of the European Economic Area (EEA), you have certain data protection rights. Benchmark Financial Wealth Advisors LLC, and all affiliates, aim to take reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Data.

If you wish to be informed what Personal Data we hold about you and if you want it to be removed from our systems, please contact us.

In certain circumstances, you have the following data protection rights:

The right to access, update or to delete the information we have on you. Whenever made possible, you can access, update or request deletion of your Personal Data directly within your account settings section. If you are unable to perform these actions yourself, please contact us to assist you.

The right of rectification. You have the right to have your information rectified if that information is inaccurate or incomplete.

The right to object. You have the right to object to our processing of your Personal Data.

The right of restriction. You have the right to request that we restrict the processing of your personal information.

The right to data portability. You have the right to be provided with a copy of the information we have on you in a structured, machine-readable and commonly used format.

The right to withdraw consent. You also have the right to withdraw your consent at any time where Benchmark Financial Wealth Advisors LLC, and all affiliates, relied on your consent to process your personal information.

Please note that we may ask you to verify your identity before responding to such requests.

You have the right to complain to a Data Protection Authority about our collection and use of your Personal Data. For more information, please contact your local data protection authority in the European Economic Area (EEA).

SERVICE PROVIDERS

We may employ third party companies and individuals to facilitate our service ("Service Providers"), to provide the service on our behalf, to perform service-related services or to assist us in analyzing how our service is used. These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

LINKS TO OTHER SITES

Our service may contain links to other sites that are not operated by us. If you click on a third party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit. We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

CHILDREN'S PRIVACY

Our service does not address anyone under the age of 18 ("Children"). We do not knowingly and without parental consent, collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your child has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from children without verification of parental consent, we take steps to remove that information from our servers.

CHANGES TO THIS PRIVACY POLICY

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy via our website and sending a copy to you directly by email or mail.

We will let you know via email and/or a prominent notice on our website, prior to the change becoming effective and update the "effective date" at the top of this Privacy Policy. You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted.

Contact Us

If you have any questions about this Privacy Policy, please contact us:

- By email: clientservices@benchmarkfinancial.info
- By visiting this page on our website: <https://benchmarkfinancial.info/contact>
- By phone number: 561-416-2992
- By mail: 2401 NW Boca Raton Blvd, Boca Raton FL 33431, United States

FEDERAL LAW GIVES YOU THE RIGHT TO LIMIT SHARING – OPTING OUT

Federal law allows you the right to limit the sharing of your NPI by "opting-out" of the following: sharing for non-affiliates' everyday business purposes – information about your creditworthiness; or sharing with affiliates or non-affiliates who use your information to market to you. State laws and individual companies may give you additional rights to limit sharing.

Please notify us immediately if you choose to opt out of these types of sharing.

DEFINITIONS

Affiliates – companies related by common ownership or control. They can be financial and non-financial companies; Non-affiliates – companies not related by common ownership or control. They can be financial and non-financial companies; Joint marketing – a formal agreement between non-affiliated financial companies that together market financial products or services to you;

THIRD PARTIES

Third Parties we share for providing services that you have not entered into a contract with. Examples of these third parties are- Compliance and Regulatory Auditing Services- Accounting Services- Electronic Communication Archiving Portfolio Management- Client Relationship Management- Marketing Communications- Financial Planning Services, Federal or States Securities Auditors

ADDITIONAL INFORMATION REGARDING THE BENCHMARK FINANCIAL WEALTH ADVISORS PRIVACY

Information for California, North Dakota, and Vermont Customers In response to applicable state law, if the mailing address provided for your account is in California, North Dakota, or Vermont, we will automatically treat your account as if you do not want us to disclose your personal information to non-affiliated third parties for purposes of them marketing to you, except as permitted by the applicable state law.

Please call if you have any questions. Your privacy, our professional ethics, and the ability to provide you with quality financial services are very important to us.

Questions? Email us at clientservices@benchmarkfinancial.info or call us at 561-416-2992

- *Privacy Choice Mail-In Form to follow*

Mail-In Form

If you would like to:

- Limit the personal information (where applicable), that your financial advisor could disclose or take if he or she moved to another brokerage or investment advisory firm.
- Limit the personal information (where applicable), that your financial advisor could disclose or take if he or she terminated their relationship with Benchmark Financial Advisors, LLC.

Please complete and mail the following form to:

Benchmark Financial Advisors
Attn: Chief Compliance Officer
2401 NW Boca Raton Blvd
Boca Raton Florida 33431

Or

You can withdraw your opt-out choice at any time by contacting us at clientservices@benchmarkfinancial.info or calling us at 561-416-2992.

If your primary address is in a state that requires your affirmative consent to share your personal information with the New Firm, then you must give your written consent before we will allow your financial advisor to take any of your personal information to that New Firm.

By completing and returning this form as described, I am instructing Benchmark Financial Advisors, LLC. to limit the personal information about me where applicable and any information that my financial advisor could disclose or take if he or she moves to another brokerage or investment advisory firm upon terminates of the relationship with Benchmark Financial Advisors, LLC.. However, I understand that Benchmark Financial Advisors, LLC. can disclose my name, address, telephone number, email and the account title of the accounts serviced by my advisor to the new brokerage or investment advisory firm as allowed under federal and certain state laws.

Please note that for accounts held jointly by two or more persons, the privacy choices made by any account holder apply to all joint holders with respect to the account.

In order for your opt-out election to be effective, you must complete ALL of the following information:

Client Name: _____ Signature: _____ Date: _____

Client Name: _____ Signature: _____ Date: _____

Client Street Address: _____

City: _____ State: _____ Zip Code: _____

Email 1: _____ Email 2: _____

IN WITNESS THEREOF, the parties have executed this Agreement on the date stated below.

Client Name:		Signature:		Date:	
Client Name:		Signature:		Date:	
Client Street Address:					
City:		State:		Zip Code:	
Email 1:		Email 2:			

Benchmark Financial Wealth Advisors, LLC					
Advisor Name:		Signature:		Date:	
Advisor Name:		Signature:		Date:	
Advisor Name:		Signature:		Date:	
CCO Name:	Roger Kalina CFP®, AIF®, ChFC®, CLU®	Signature:		Date:	