



Privacy Policy

Last Update: January 1, 2023

Our Commitment to You

Spillane Financial Planning, Inc. is committed to safeguarding the use of personal information we obtain from our current, former, and prospective clients. We recognize that our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything we can to maintain that trust. We protect the security and confidentiality of your personal information and implement controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

We do not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with servicing our relationship with you, or as required by law, or at your direction.

Why you need to know?

We must share some of your personal information in the course of servicing our relationship with you. Federal and State laws give you the right to limit some of this sharing and require us to disclose how we collect, share, and protect your personal information.

What information do we collect from you?

Social Security number	Assets and liabilities
Name, address, and date of birth	Income and expenses
E-mail address and telephone number	Investment activity
Account information (including other institutions)	Investment experience and goals

What Information do we collect from other sources?

Custody, brokerage, and advisory agreements	Account applications and forms
Other agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

How do we protect your information?

To safeguard your personal information, we maintain physical, procedural, and electronic security measures. These include such safeguards as secure passwords, encrypted file storage, and a secure office environment. We educate our 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. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. We require third parties that assist in providing our services to you to protect the personal information they receive from us.

How do we share your information?

We share your personal information to effectively service our relationship with you. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
Servicing our Clients We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, Custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.	Yes	No
Marketing Purposes We do not disclose, and do not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where we or the client has a formal agreement with the financial institution. We will only share information for purposes of servicing your accounts, not for marketing purposes.	No	Not Shared
Authorized Users Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent(s) or representative(s).	Yes	Yes
Information About Former Clients We do not disclose and do not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients.	No	Not Shared

State-specific Regulations

Massachusetts	In response to a Massachusetts law, clients must “opt-in” to share non-public personal information with non-affiliated third parties before any personal information is disclosed. We may disclose non-public personal information to other financial institutions with whom we have joint business arrangements for proper business purposes in connection with the servicing of our relationship with you.
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Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise this Policy and will provide you with a revised policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (339) 298-1570.