



(In this policy, “we” and “us” refer to Practical Financial Planning, Inc.)

We are as concerned about my privacy as most consumers. So, we have structured Practical Financial Planning’s privacy policy to maximize the client’s privacy. While some firms start with the minimally-required privacy measures and move slightly toward more protection, we take the view that Practical Financial Planning will provide the greatest privacy protection, as far as reasonably possible.

Accordingly, we commit to you that client files and non-public client information of any and every kind will, unless authorized by the client, remain absolutely confidential, with *only* these exceptions:

1. We use computer software to prepare and electronically file income tax returns. In the process, client information is shared with the software provider through a secure internet connection. Our software providers have assured us that they use this information solely to further our tasks of providing tax advice, return preparation, and electronic filing. Electronic filing involves sending your tax return to the IRS and, in some cases, one or more states and/or taxing municipalities, through our income tax software provider. Tax return data is sometimes shared with the tax software provider to gain their technical assistance in the preparation of your returns, or with agencies such as the IRS, or state or city taxing or tax processing agencies to resolve tax issues for clients.
2. We use various programs on our computer systems in which confidential information may be available to the providers of such systems. Examples include our client information and financial/retirement planning systems, both of which are cloud-based. We believe the providers of these systems take reasonable precautions to secure the confidentiality of client data.
3. All our financial files, including client files, are open to review by proper legal authorities. For instance, the Division of Securities of the Ohio Department of Commerce licenses us as investment advisors and has the right to audit and review our files. The purpose of such an audit is to ensure that investment advisors follow applicable laws, rules, and regulations designed to protect the client.
4. As with any information in any business, we would have to respond to proper legal process (such as a subpoena), if we should ever be served with one. However, we will never willingly divulge any confidential information without such process (or your consent), except as described in this policy. We will also make reasonable attempts to secure client information by invoking any applicable legal privilege on request.
5. Staff members, including temporary help, are given access to client information on a need-to-know basis. Staff members, including temporary help, are required to sign a confidentiality statement acknowledging the need for strict client privacy.

**Client information is never sold, shared, or otherwise allowed outside of Practical Financial Planning, nor used for any marketing purposes whatsoever except those of Practical Financial Planning.** We never sell or give to others client mailing lists of any kind.

If we modify this privacy policy, we will notify then-current clients. If you have questions about this privacy policy, or suggestions about how it can be improved, please call us at (216) 688-3737.