



## **Freya Financial Services**

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### **Firm Brochure**

(Part 2A of Form ADV)

This brochure provides information about the qualifications and business practices of Freya Financial Services. If you have any questions about the contents of this brochure, please contact us at: 781.756.9992, or by email at: [info@freyafinancial.com](mailto:info@freyafinancial.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission, or by any state securities authority.

Additional information about Freya Financial Services is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can obtain the disciplinary history of Freya Financial Services or its representatives from the Massachusetts Securities Division, One Ashburton Place, 17<sup>th</sup> Floor, Boston, MA 02108.

Being a "registered investment adviser" or describing ourselves as being "registered" does not imply a certain level of skill or training

February 29, 2024

Freya Financial Services

## Material Changes

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### **Annual Update**

The Material Changes section of this brochure will be updated annually when material changes occur since the previous release of the Firm Brochure.

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### **Material Changes since the Last Update**

We offer or deliver information about our qualifications and business practices to clients on at least an annual basis. We review and update this brochure at least annually, in order to ensure that it remains current. Pursuant to new SEC rules, we will provide each of our clients with a summary of any material changes for subsequent annual updates to brochures by April 30<sup>th</sup> of each year. We will further provide our clients with additional information regarding material changes at our firm at other times within a reasonable time after such changes occur.

The only material change in this time period is the change of custodian from TD Ameritrade to Charles Schwab & Co., Inc.

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### **Full Brochure Available**

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at: 781.756.9992 or by email at: [info@freyafinancial.com](mailto:info@freyafinancial.com).

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## Advisory Business

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### **Firm Description**

Freya Financial Services was founded in 1998 by Linda Colleen Nelson who is a sole practitioner. At that time, she went by the name of Linda N. Homsey. The firm is registered with the State of Massachusetts as a Registered Investment Adviser.

Freya Financial Services provides personalized financial life planning and investment management to individuals, families, and small businesses. Freya Financial Services works with clients to define their financial objectives and to develop strategies for achieving those objectives some of which may include: cash flow management, net worth management, investment management, tax planning, insurance review, education funding, retirement planning, and other special issues specific to the client.

Investment advice is provided, with the client making the final decision on investment selection. Freya Financial Services does not act as a custodian of client assets. The client always maintains asset control. Freya Financial Services places trades for clients under a limited power of attorney.

Freya Financial Services is strictly a fee-only financial life planning and investment management firm. The firm does not sell commissioned products. The firm is not affiliated with entities that sell financial products or securities. No commissions in any form are accepted. No finder's fees are accepted. The firm's compensation is solely from fees paid directly by clients.

Freya Financial Services may recommend other professionals (e.g., lawyers, accountants, insurance agents, etc.) at the request of the client. Other professionals are engaged directly by the client on an as-needed basis. Conflicts of interest will be disclosed to the client in the unlikely event they should occur.

The initial meeting, which may be by telephone, is free of charge and is considered an exploratory interview to determine the extent to which financial planning and investment management may be beneficial to the client.

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### **Principal Owners**

Linda Colleen Nelson, CFP®, RLP® is the owner and sole practitioner.

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### **Types of Advisory Services**

The primary types of advisory services offered by Freya Financial Services are investment supervisory services (i.e., "asset management") and financial life planning. Freya Financial Services provides investment advice, but only as part of an ongoing financial planning relationship (Wealth Management Services). Freya Financial Services also offers financial life planning services without investment supervisory services, and workshops/consultations for companies and organizations.

In performing its services, Freya Financial Services is not required to verify any information received from the client or from the client's other professionals. Each

client is advised that it remains his/her responsibility to promptly notify Freya Financial Services when there is any change in his/her financial situation and/or financial objectives for the purpose of reviewing, evaluating, or revising previous recommendations and/or services.

As of 1/1/2024 Freya Financial Services had approximately \$20,600,000 in assets under management for 21 clients. Approximately \$0 is managed on a discretionary basis, and \$20,600,000 is managed on a non-discretionary basis.

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### **Tailored Relationships**

The goals and objectives are unique for each client. After considering each client's goals, time horizon, and risk tolerance, a customized financial life plan and investment portfolio is constructed. Investment policy statements are created for Wealth Management clients that reflect their stated goals and objective. Clients may impose restrictions on investing in certain securities or types of securities.

Agreements may not be assigned without client consent.

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### **Types of Agreements**

The following agreements define the typical client relationships:

#### **Wealth Management Services (On-going services):**

This service includes financial life planning and ongoing asset management/monitoring services. Realistic and measurable goals are set and objectives to reach those goals are defined. As goals and objectives change over time, suggestions are made and implemented on an ongoing basis.

The scope of work and fee for a Wealth Management Agreement is provided to the client in writing prior to the start of the relationship. A Wealth Management Agreement may include: review of cash flow and net worth; insurance review; investment management (including performance reporting); education planning; retirement planning; and estate planning; as well as the implementation of recommendations in the investment area. Referrals are given for implementation in the other areas if needed.

The engagement also includes unlimited telephone support, meetings as required, on-going financial life planning services, and quarterly, semi-annual or annual written portfolio reviews as negotiated with each client. More frequent reviews may occur but are not necessarily communicated to the client unless immediate changes are recommended.

Assets are invested primarily in no-load or low-load mutual funds, usually through broker-dealer or mutual fund companies. Mutual fund companies charge each fund shareholder an investment management fee that is disclosed in the fund prospectus. The custodian or broker-dealer may charge a transaction fee for the purchase and/or sale of some mutual funds.

Investments may also include: equities (stocks), corporate debt securities, certificates of deposits, U.S. government securities, and exchange traded funds when appropriate.

The brokerage firm charges a fee for stocks, bond trades, and exchange traded funds. Freya Financial Services does not receive any compensation, in any form, from fund companies or from the custodian or broker-dealer.

Initial public offerings (IPOs) are not available through Freya Financial Services

The annual Wealth Management fee is based on a percentage of the investable assets according to the following schedule:

- 1.25% on the first \$500,000;
- 1.00% on the next \$500,000 (from \$500,001 to \$1,000,000)
- 0.75% on the next \$2,000,000 (from \$1,000,001 to \$3,000,000)
- .50% on assets over \$3,000,000

There is a minimum annual fee of \$3,000 and fees are negotiable. Current client relationships may exist where the fees are higher or lower than the fee schedule above.

In some circumstances, a retainer fee is charged in lieu of an Wealth Management fee when it is more appropriate to work on a fixed-fee basis. The annual retainer fee varies depending on amount of assets (generally 1% of assets) and is negotiable.

Although the Wealth Management agreement is an ongoing agreement and constant adjustments are required, the length of service to the client is at the client's discretion. The client or the adviser may terminate an Agreement by written notice to the other party. At termination, fees will be billed on a pro rata basis for the portion of the quarter completed. The portfolio value at the completion of the prior full billing quarter is used as the basis for the fee computation, adjusted for the number of days during the billing quarter prior to termination.

**Financial Life Planning Agreement (Fee-for-service):**

A financial life plan is designed to help the client with aspects of financial life planning without ongoing investment management or implementation after the financial life plan is completed. This is a fee-for-service agreement.

The financial life plan may include, but is not limited to: a net worth statement; a cash flow statement; a review of investment accounts, including reviewing current asset allocation; strategic tax planning; a review of retirement accounts and plans including general recommendations (not specific); a review of insurance coverage and recommendations for changes, if necessary; one or more retirement scenarios; estate planning review and recommendations; and education planning with funding recommendations.

General investment advice is provided as part of a financial plan. General advice includes discussion about asset allocation and risk. Final and specific investment selection and implementation is at the discretion of the client.

The fee for a financial plan is predicated upon the facts known at the start of the engagement and is priced on the complexity associated with the client's situation. The fee for the Financial Life Planning Agreement is \$300 per hour. An estimate is given to the client in the agreement based on the number of hours of meetings (generally 2 to 3 meetings of 1 ½ to 2 hours each) and time spent working on the plan. The range

is generally between \$3,000 and \$6,000, based on the complexity of the client's situation. There is a minimum fee of \$3,000 and the fees are negotiable.

Financial Life Planning engagements may be upgraded to Wealth Management agreements upon completion if the client so desires.

Since financial life planning is a discovery process, situations occur wherein the client is unaware of certain financial exposures or predicaments. In the event that the client's situation is substantially different than disclosed at the initial meeting, a revised fee will be provided for mutual agreement. The client must approve the change of scope in advance of the additional work being performed when a fee increase is necessary.

After delivery of a financial plan, future face-to-face meetings may be scheduled as necessary. Follow-on implementation work is billed separately at the rate of \$300 per hour.

### **Workshops/Educational Services for Companies/Associations**

Freya Financial Services occasionally provides employee workshops/consultations for companies/associations upon their request. The compensation is a flat fee based on the scope of the material to be covered and the number of attendees.

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### **Termination of Agreement**

A client may terminate any of the aforementioned agreements at any time by notifying Freya Financial Services in writing and paying the rate for the time spent on the advisory engagement prior to notification of termination. If the client made an advance payment, Freya Financial Services will refund any unearned portion of the advance payment.

Freya Financial Services may terminate any of the aforementioned agreements at any time by notifying the client in writing. If the client made an advance payment, Freya Financial Services will refund any unearned portion of the advance payment.

## **Fees and Compensation**

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### **Description**

Freya Financial Services bases its fees on a percentage of assets under management, hourly charges, retainer fees, and fees for speaking/workshops. The fee is based on the type of agreement entered into by client. Please see fees stated for each type of agreement in the Advisory Business section on pages 2 through 4 of this brochure.

Fees are negotiable.

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### **Fee Billing**

Wealth Management fees are billed quarterly, in advance, meaning that the Client will be invoiced on the first day of the next quarter. Payment in full is expected upon presentation of invoice. Depending on the location of the Client's assets, the method of payment is as follows:

- Wealth Management clients with accounts at Charles Schwab & Co., Inc. – Freya Financial Services will send invoices to the Client and Charles Schwab & Co., Inc. at the same time. The custodian (Charles Schwab & Co., Inc.) will deduct the fee directly from the Clients' accounts. The Client provides written authorization permitting Freya Financial Services to be paid directly from accounts held by custodian. Clients may opt to pay Advisor directly rather than have fees deducted from accounts.
- Wealth Management clients with retail accounts at other custodians - Client will be invoiced directly and payment is expected directly from the Client.

Fees for financial life plans (Fee-for-service) are billed 50% in advance upon signing the agreement, with the balance due upon delivery of the financial plan.

Fees for workshop/educational services are due at time of service.

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### **Other Fees**

Custodians may charge transaction fees on purchases or sales of certain mutual funds and exchange-traded funds. These transaction charges are usually small and incidental to the purchase or sale of a security. The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security.

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### **Expense Ratios**

Mutual funds generally charge a management fee for their services as investment managers. The management fee is called an expense ratio. For example, an expense ratio of 0.50 means that the mutual fund company charges 0.5% for their services. These fees are in addition to the fees paid by you to Freya Financial Services.

Performance figures quoted by mutual fund companies in various publications are after their fees have been deducted.

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### **Past Due Accounts and Termination of Agreement**

Freya Financial Services reserves the right to stop work on any account that is more than 60 days overdue. In addition, Freya Financial Services reserves the right to terminate any financial planning engagement where a client has willfully concealed or has refused to provide pertinent information about financial situations when necessary and appropriate, in Freya Financial Service's judgment, to providing proper financial advice. Any unused portion of fees collected in advance will be refunded within 30 days.

## Performance-Based Fees

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### **Sharing of Capital Gains**

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

Freya Financial Services does not use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.

## Types of Clients

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### **Description**

Freya Financial Services generally provides financial planning and investment advice to individuals, families, and small businesses.

Client relationships vary in scope and length of service.

### **Account Minimums**

Freya Financial Services does not impose a minimum dollar value of assets or other conditions for opening or maintaining an account, but there are advisor fee minimums.

## Methods of Analysis, Investment Strategies and Risk of Loss

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### **Methods of Analysis**

Freya Financial Services' investment approach is rooted in the belief that markets are fairly efficient although not always rational, and that investors' returns are determined principally by asset allocation. We focus on developing and implementing globally diversified portfolios, principally through the use of mutual funds.

The main sources of information for security analysis include research materials and newsletters prepared by others, annual reports, prospectuses, financial newspapers and magazines.

Other sources of information that Freya Financial Securities may use include information provided by Charles Schwab & Co., Inc., Morningstar Advisor Workstation mutual fund information, and research available to the public from Fidelity, Vanguard, Dimensional Fund Advisors, and the World Wide Web. Employee of Freya Financial Services also attends conference calls with mutual fund companies and industry conferences.

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## **Investment Strategies**

The primary investment strategy used on client accounts is strategic asset allocation. Target allocations for various asset classes are set in an Investment Policy Statement. The targeted allocations are periodically rebalanced back to the original allocation if there is too much deviation from the original target. The target allocations depend on a number of factors, i.e. the investor's risk tolerance, time horizon, and objectives. Portfolios are globally diversified to control the risk associated with traditional markets.

The investment strategy for a specific client is based upon the objectives stated by the client during consultations. The client may change these objectives at any time. Each client executes an Investment Policy Statement which is reviewed annually.

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## **Risk of Loss**

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a

standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.

- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

## **Disciplinary Information**

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### **Legal and Disciplinary**

The firm and its employee have not been involved in legal or disciplinary events related to past or present investment clients.

## **Other Financial Industry Activities and Affiliations**

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### **Financial Industry Activities**

Freya Financial Services does not participate in any other industry business activities.

### **Affiliations**

Freya Financial Services does not have any arrangements that are material to its advisory or its clients with a related person who is a broker-dealer, investment company, other investment advisor, financial planning firm, commodity pool operator, commodity trading adviser or futures commission merchant, banking or thrift institution, accounting firm, law firm, insurance company or agency, pension consultant, real estate broker or dealer, or an entity that creates or packages limited partnerships.

## **Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

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### **Code of Ethics**

The employee of Freya Financial Services has committed to a Code of Ethics that is available for review by clients and prospective clients upon request. The firm will provide a copy of the Code of Ethics to any client or prospective client upon request. The advisor/employee abides by a fiduciary standard. The advisor/employee has a duty of utmost good faith to act solely in the best interest of each client. This is one of the principles underlying the Code of Ethics.

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**Participation or Interest in Client Transactions**

Freya Financial Services and its employee may buy or sell mutual funds that are also held by clients. The restriction is based on the suitability of the investment for the client. The employee's positions in the mutual funds are de minimus in relation to the size of the mutual fund and would not affect the market. The employee puts the clients' interest before her own. Employee complies with the provisions of the Freya Financial Services *Compliance Manual*.

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**Personal Trading**

The Chief Compliance Officer of Freya Financial Services is Linda Colleen Nelson, CFP®, RLP®. She reviews her trades each quarter. The personal trading reviews ensure that the personal trading of employee does not affect the markets, and that clients of the firm receive preferential treatment. Since most employee trades are small mutual fund trades, the trades do not affect the securities markets.

## Brokerage Practices

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**Selecting Brokerage Firms**

Freya Financial Services participates in the Charles Schwab & Co., Inc. custodial agreement. Charles Schwab & Co., Inc. offers to independent investment Advisors, services which include custody of securities, trade execution, clearance, and settlement of transactions. Advisor receives some benefits from Charles Schwab & Co., Inc. through its participation in the program. (Please see the disclosure under "Client Referrals and Other Compensation" below.) The Clients open accounts with Charles Schwab & Co., Inc. and grant Advisor limited power of attorney to trade on their behalf and to receive account information.

Clients may use any broker dealer and/or custodian they choose on their own. If the Client chooses not to open an account at Charles Schwab & Co., Inc., the client opens a retail account with the brokerage firm/custodian they choose. The clients grant Freya Financial Services with limited power of attorney or trading authority to trade in their accounts and to receive information on their accounts. If the client chooses to retain their existing account or open an account at a broker dealer of their choice, they may not be able to achieve the most favorable execution of their transactions. The trades may also cost more money because of higher fees or commissions charged by the broker dealer or their mutual fund companies.

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**Best Execution**

Consistent with its fiduciary obligations, Freya Financial Services seeks best execution in all transactions on behalf of the clients. The executions of trades for mutual funds are performed at the end of the day based on closing prices. Trading fees charged by the custodians are reviewed. Freya Financial Services does not receive any portion of the trading fees. Freya Financial Services is expected to be

mindful of her responsibility to seek best execution for the clients as part of her daily business activities, and is encouraged to look for ways to improve upon the best execution process.

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**Soft Dollars**

Freya Financial Services does not have any soft dollar arrangements.

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**Order Aggregation**

Most trades are mutual funds where trade aggregation does not garner any client benefit.

## Review of Accounts

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**Periodic Reviews**

Wealth Management Agreements (on-going service): Account reviews for clients are performed quarterly by advisor Linda Colleen Nelson, CFP®, RLP®. Account reviews for Wealth Management clients are performed more frequently when market conditions dictate or upon client's request.

Financial Life Planning Agreements (fee-for-service): A written report is presented at the completion of the financial life planning engagement addressing the goals and objectives to be covered in the plan for the client. There will be no further reports or reviews for the engagement. Further reviews of the plan by Freya Financial Services will be at the request and expense of the client as an additional service/engagement. Freya Financial Services recommends the clients have their plans reviewed on a regular basis (yearly) or when there is a change in their objectives and/or time horizon.

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**Review Triggers**

Other conditions that may trigger a review are changes in the tax laws, new investment information, and changes in a client's own situation.

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**Regular Reports**

Wealth Management Agreements (on-going service): Clients receive periodic communications on at least an annual basis. Wealth Management clients receive written quarterly updates. The written updates may include a net worth statement, portfolio statement, rate of return for portfolio, and rate of return for benchmarks. The client receives a monthly/quarterly statement from the custodian/broker-dealer.

Financial Life Planning Agreements (fee-for-service): Clients receive a written report at the completion of the Financial Life Planning engagement.

There are no reports provided for hourly consultations or workshop/educational services.

## **Client Referrals and Other Compensation**

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As disclosed under “Brokerage Practices” above, Advisor participates in Charles Schwab & Co., Inc.’s institutional customer program and Advisor may recommend Charles Schwab & Co., Inc. to Clients for custody and brokerage services. There is no direct link between Advisor’s participation in the program and the investment advice that is given to its Clients, although Advisor receives economic benefits through its participation in the program that are typically not available to Charles Schwab & Co., Inc. retail investors. These benefits include the following products and services (provided with cost or at a discount): receipt of duplicate Client statements and confirmations; related products and tools; consulting services; access to a trading desk serving Advisor participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to the Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and compliance marketing, research, technology, and practice management products or services provided to Advisor by third party vendors without cost or at a discount. Charles Schwab & Co., Inc. may also have paid for business consulting and professional services received by Advisor’s related persons. Some of the products and services made available by Charles Schwab & Co., Inc. through the program may benefit Advisor but may not benefit its Client accounts. These products or services may assist Advisor in managing and administering Client accounts, including accounts not maintained at Charles Schwab & Co., Inc. Other services made available by Charles Schwab & Co., Inc. are intended to help Advisor manage and further develop its business enterprise. The benefits received by Advisor or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to Charles Schwab & Co., Inc. As part of its fiduciary duties to clients, Advisor endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by Advisor or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the Advisor’s choice of Charles Schwab & Co., Inc. for custody and brokerage services.

### **Incoming Referrals**

Freya Financial Services has been fortunate to receive many client referrals over the years. The referrals came from current clients, other financial advisors, estate planning attorneys, accountants, and other similar sources. The firm does not compensate referring parties for these referrals.

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### **Referrals Out**

Freya Financial Services does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

## Custody

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### **Account Statements**

Freya Financial Services does not have custody of clients' funds or securities. All assets are held at qualified custodians, which means the custodians provide account statements directly to clients at their address of record at least quarterly.

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### **Performance Reports**

Clients are urged to compare the account statements received directly from their custodians to the performance report statements provided by Freya Financial Services.

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### **Statements Provided by Freya Financial Services**

At times clients are provided account statements, net worth statements and net worth graphs that are generated from our portfolio accounting and financial planning software. Net worth statements contain approximations of bank account balances provided by the client, as well as the value of land and hard-to-price real estate provided by the client. The net worth statements are used for long-term financial planning where the exact values of assets are not material to the financial planning tasks.

## Investment Discretion

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### **Discretionary Authority for Trading**

Freya Financial Services does not accept discretionary authority to manage securities accounts on behalf of clients. For Wealth Management accounts Freya Financial Services determines the securities to be bought or sold, and the amount of the securities to be bought or sold. However, Freya Financial Services consults with the client prior to each trade to obtain their approval for the trade.

The client approves the commission rates paid to the custodian when applicable. Freya Financial Services does not receive any portion of the transaction fees or commissions paid by the client to the custodian on certain trades.

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### **Limited Power of Attorney**

Clients open retail accounts at brokerage firms. The client signs a limited power of attorney (trading authorization) so that Freya Financial Services may execute the trades that are approved by the client.

## Voting Client Securities

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### Proxy Votes

Freya Financial Services does not vote proxies on securities. Clients are expected to vote their own proxies.

## Financial Information

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### Financial Condition

Freya Financial Services does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients.

A balance sheet is not required to be provided because Freya Financial Services does not serve as a custodian for client funds or securities, and does not require prepayment of fees of more than \$600 per client, and six months or more in advance.

## Business Continuity Plan

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### General

Freya Financial Services has a Business Continuity Plan in place that provides detailed steps to mitigate and recover from the loss of office space, communications, services or key people.

### Disasters

The Business Continuity Plan covers natural disasters such as snow storms, hurricanes, tornados, and flooding. The Plan covers man-made disasters such as loss of electrical power, loss of water pressure, fire, bomb threat, nuclear emergency, chemical event, biological event, T-1 communications line outage, Internet outage, railway accident and aircraft accident. Electronic files are backed up daily and archived offsite.

### Alternate Offices

Alternate offices are identified to support ongoing operations in the event the main office is unavailable. It is our intention to contact all clients within five days of a disaster that dictates moving our office to an alternate location.

### Loss of Key Personnel

Freya Financial Services has an agreement with another financial advisory firm to support business continuation for Freya Financial Services in the event of Linda Colleen Nelson's serious disability or death.

## Information Security Program

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### Information Security

Freya Financial Services maintains an information security program to reduce the risk that your personal and confidential information may be breached.

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### Privacy Notice

Freya Financial Services is committed to maintaining the confidentiality, integrity and security of the personal information that is entrusted to us.

The categories of nonpublic information that we collect from you may include information about your personal finances, information about your health to the extent that it is needed for the financial planning process, and information about transactions between you and third parties. We use this information to help you meet your personal financial goals.

With your permission, we disclose limited information to attorneys, accountants, and mortgage lenders with whom you have established a relationship. You may opt out from our sharing information with these nonaffiliated third parties by notifying us at any time by telephone, mail, fax, email, or in person. With your permission, we share a limited amount of information about you with your brokerage firm in order to execute securities transactions on your behalf.

We maintain a secure office to ensure that your information is not placed at unreasonable risk. We employ a firewall barrier, secure data encryption techniques and authentication procedures in our computer environment.

We do not provide your personal information to mailing list vendors or solicitors. We require strict confidentiality in our agreements with unaffiliated third parties that require access to your personal information, including financial service companies, consultants, and auditors. Federal and state securities regulators may review our Company records and your personal records as permitted by law.

Personally identifiable information about you will be maintained while you are a client, and for the required period thereafter that records are required to be maintained by federal and state securities laws. After that time, information may be destroyed.

We will notify you in advance if our privacy policy is expected to change. We are required by law to deliver this *Privacy Notice* to you annually, in writing.

## State Registrant Information

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### State-registered Adviser Information

Please see the Brochure Supplement (Part 2 B of Form ADV) for disclosures of the Principal Officer and employee of Freya Financial Services. The brochure is attached.

**Brochure Supplement (Part 2B of Form ADV)**

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**Freya Financial Services**

15 Depot Square, Suite 2

Lexington, MA 02420

781.756.9992

As of February 29, 2024

This brochure supplement provides information about Linda Colleen Nelson that supplements the Freya Financial Services brochure. You should have received a copy of that brochure. Please contact Linda Colleen Nelson, Owner, if you did not receive Freya Financial Services' brochure or if you have any questions about the contents of this supplement.

Additional information about Linda Colleen Nelson is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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### **Education and Business Standards**

Freya Financial Services requires that advisors in its employ have a bachelor's degree and further coursework demonstrating knowledge of financial planning, tax planning, and/or asset management. Examples of acceptable coursework include: an MBA, a CFP®, a CFA, a ChFC, JD, CTFA, EA or CPA. Additionally, advisors must have work experience that demonstrates their aptitude for financial planning and investment management.

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### **Professional Certifications**

Linda Colleen Nelson, CFP®, RLP® has earned certifications and credentials that are required to be explained in further detail.

**Certified Financial Planner (CFP)**: The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, just about 99,000 individuals have obtained CFP® certification. To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in two 3-hour sessions over one-day, includes case studies and client scenarios designed to test one's ability to correctly diagnose

financial planning issues and apply one's knowledge of financial planning to real world circumstances;

- Experience – You must complete 6,000 hours of professional experience related to the financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
- Ethics – You must commit to CFP Board to act as a fiduciary, meaning acting in the best interests of the client at all times when providing financial advice – and commit to other higher ethical and conduct standards.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

**Registered Life Planner®:** Registered Life Planners are registered with the Kinder Institute to use their mark. RLP® registration requirements:

- Complete a 2-day Seven Stages of Money Maturity Workshop – a Model for Developing Client Relationships
- Complete the 5-day Advanced Training: Applying the EVOKE® Life Planning Methodology to Client Engagements
- Complete the RLP® Mentorship: A 6-month Online Case Study Seminar

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### **Linda Colleen Nelson, CFP®, RLP®**

Educational Background:

- Date of birth: 11/28/1949
- Bachelors of Science from Virginia Commonwealth University – 1972
- Diploma in Financial Planning from Boston University – 1996

Business Experience:

- Linda founded Freya Financial Services in 1998. At the time her name was Linda N. Homsey. For a period in 2002 Linda was a Registered Advisor at Progressive Asset Management in Wellesley, MA and then returned to Freya Financial Services. Prior to 1998 Linda was a financial planner at Parallax Partners Inc. in Newton, MA from 1996 - 1997. She also was employed at Law Office of Kenneth Homsey in Methuen, MA from 1993 – 1996 advising clients on retirement and tax issues, providing valuation of

settlement proposals and bookkeeping services. From 1976 – 1982 Linda was employed at E.F. Hutton & Co., Inc, in Boston, MA as a Registered Representative with the National Association of Security Dealers and with the Commodity Futures Trading Commission. She received her CFP® designation in 1995.

Disciplinary Information: No disciplinary actions

Other Business Activities: There are no outside business activities

Additional Compensation: None

Supervision:

Linda Colleen Nelson is a sole practitioner.

Phone Number: 781-756-9992

Email: linda@freyafinancial.com

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None