

## Privacy Notice and Cybersecurity Statement

At CS Planning Corp. (“CSP”), we are committed to protecting the privacy and confidentiality of the personal and financial information we gather about our clients. Because we value the trust our clients have placed in our firm, we understand the importance of maintaining controls necessary for securing nonpublic information. Our Privacy Policy is derived from the basic principles of integrity and standards of conduct. As a result, we do not now, nor do we intend in the future to, sell or trade nonpublic information to nonaffiliated third parties. When information is given to a third party provider, it is for the sole purpose of providing the highest standard of service to maintain a client account.

To ensure that you, as a client, understand what information we gather about you, how we use it, and the safeguards we have in place to protect this information, we have outlined below our Privacy Policy.

### The Information We Collect:

The advisors affiliated with CSP may collect and retain nonpublic personal information about you to serve your financial needs, provide you with a high standard of service, and fulfill legal and regulatory requirements. This information may include:

1. Name, address, social security numbers, income information, employment information, beneficiary information as needed, and the like, may be used for the purpose of establishing and maintaining an account.
2. Asset and account information, phone numbers, and professional contacts may be used for the purpose of transferring in an account from another financial institution.
3. Financial data, family data, and background information may be collected depending upon the scope of your engagement with the advisor and CSP. It may also include information about your health, to the extent that it is needed for the planning process.

### The Information We Share:

The categories of information that may be disclosed to nonaffiliated third parties, specifically Fidelity or other custodians, may include name, address, social security numbers, and beneficiary information, as needed to carry out the duties for which you retained us. This information is disclosed to further your account establishment and transactions pertaining to your directives. This may include information to provide distributions, receive assets into an account, or transfer assets between accounts.

Furthermore, as permitted by federal and state law, we may disclose information with third party administrators engaged to work with us to administer or enforce a transaction that you request or authorize. This may also include the development and maintenance of software systems. When information is provided to third party providers to service the account, safeguards are in place to ensure that the information is used only for the purpose it is provided. For unaffiliated third parties that require access to your personal information, including financial service companies, consultants, and auditors, we also require strict confidentiality in our agreements with them.

In addition, we may be required by law or regulation to disclose information to third parties. This may be in response to a subpoena, to prevent fraud, or to comply with rules or inquiries from industry, state, and federal regulators.

Personally identifiable information about you will be maintained during the time you are a client, and for the time thereafter that such records are required to be maintained by federal and state securities laws. After the required period of record retention, all such information will be destroyed.

*Under no circumstances do we share nonpublic information for marketing purposes. We do not provide your personally identifiable information to mailing list vendors or solicitors for any purpose.*

### The Safeguards We Maintain to Ensure Information Security:

At CSP, we maintain safeguards that comply with applicable law to secure your nonpublic personal information. We limit access to your nonpublic information, including your personal health information to those employees who need to know that information to assist in providing the financial services you have engaged us to perform. Internally, we implement background checks on all employees and screen for criminal convictions. In addition, we advise them of the Privacy Policies and Practices of CSP, and of the confidential nature of the information they may handle.

To ensure the integrity of the nonpublic information you provide to us, we maintain secure computers and technology. We have installed computer and electronic systems that are backed up daily. We require our computer workstations to authenticate through active directory with passwords that expire periodically and password complexity is enforced through group policy objects. We use up to 12 character computer password encryption. Mobile phones have been confirmed to use 12 digit passwords. We use firewalls, require periodic deletion of individual computer browser histories, and we use antivirus software to further protect the information collected and retained from you.

**The Privacy Principles** that we uphold throughout CSP also extends to our business partners. The companies with which we may share information about you are required to uphold the same standard of integrity, ethics, and confidentiality with regard to that information. We will reaffirm this policy annually in writing, as long as you maintain an ongoing relationship with CSP.

In this notice of our Privacy Statement, the word “you” is used to mean any individual who has or is currently engaging an advisor of CS Planning Corp., to perform financial professional services.