

# Financial Guard Privacy and Security Notice

## June 2017

### **Your Privacy and the Security of Your Personal Information is Very Important to Financial Guard**

This Privacy and Security Notice (the "Privacy Notice") addresses Financial Guard's privacy and data protection practices with respect to nonpublic personal information received. The provisions of this Privacy Notice apply to your information both while you are a customer and after you are no longer a customer of Financial Guard.

### **The Type of Nonpublic Personal Information Financial Guard Collects About You**

Financial Guard collects and maintains nonpublic personal information about you in connection with your account. Such information may include, but is not limited to:

- Personal information included on applications or other forms, which may include your spouse and/or access to beneficiary information, depending on the type of account;
- Account balances, transactions, and mutual fund holdings and positions;
- Online account access user IDs, passwords, security challenge question responses;
- Information received from consumer reporting agencies regarding credit history and creditworthiness (such as the amount of an individual's total debt, payment history, etc.); and
- Information necessary to comply with applicable laws and regulations.

### **How Financial Guard Uses Nonpublic Personal Information About You**

Financial Guard does not sell or share your nonpublic personal information with third parties or with affiliates for their marketing purposes or with other financial institutions or affiliates for joint marketing purposes, unless you have authorized Financial Guard to do so. Financial Guard does not disclose any nonpublic personal information about you except as may be required to perform transactions or services you have authorized or as permitted or required by law.

Financial Guard may disclose information about you to:

- Employees, agents, and affiliates on a "need to know" basis to enable Financial Guard to conduct ordinary business or comply with obligations to government regulators;
- Service providers, including Financial Guard affiliates, who assist Financial Guard as part of the ordinary course of business (such as printing, mailing services, or processing or servicing your account with us) or otherwise perform services on Financial Guard's behalf, including companies that may perform marketing services solely for Financial Guard;
- Financial Guard representatives such as legal counsel, accountants and auditors; and
- Fiduciaries or representatives acting on your behalf, such as an IRA custodian or trustee of a grantor trust.

Except as otherwise permitted by applicable law, companies acting on Financial Guard's behalf are contractually obligated to keep nonpublic personal information Financial Guard provides to them confidential and to use the information Financial Guard shares only to provide the services Financial Guard asks them to perform.

Financial Guard may disclose nonpublic personal information about you when necessary to enforce their rights or protect against fraud, or as permitted or required by applicable law, such as in connection with a law enforcement or regulatory request, subpoena, or similar legal process. In the event of a corporate action or in the event a Financial Guard service provider changes, Financial Guard may be required to disclose your nonpublic personal information to third parties. While it is Financial Guard's practice to obtain protections for disclosed information in these types of transactions, Financial Guard cannot guarantee their privacy policy will remain unchanged.

### **Keeping You Informed of Financial Guard's Privacy and Security Practices**

While Financial Guard reserves the right to modify this policy at any time, we will notify you promptly if this privacy policy changes.

### **Financial Guard's Security Practices**

Financial Guard maintains appropriate physical, electronic and procedural safeguards designed to guard your nonpublic personal information. Financial Guard's internal data security policies restrict access to your nonpublic personal information to authorized employees, who may use your nonpublic personal information for Financial Guard business purposes only.

Although Financial Guard strives to protect your nonpublic personal information, they cannot ensure or warrant the security of any information you provide or transmit to them, and you do so at your own risk. In the event of a breach of the confidentiality or security of your nonpublic personal information, Financial Guard will attempt to notify you as necessary so you can take appropriate protective steps. If you have consented to Financial Guard using electronic communications or electronic delivery of statements, they may notify you under such circumstances using the most current email address you have on record with them.

In order for Financial Guard to provide effective service to you, keeping your account information accurate is very important. If you believe that your account information is incomplete, not accurate or not current, or if you have questions about Financial Guard's privacy practices, you may contact Financial Guard by the following methods:

Email: [support@financialguard.com](mailto:support@financialguard.com)

By Mail:

Financial Guard

1952 E. Fort Union Blvd

Suite 200

Salt Lake City, Utah 84121

By Phone: (877) 247-6070