

## **Privacy Policy**

This Privacy Policy is provided to you on behalf of David Scolamiero, CPA and Integrated Financial, LLC and the organization collectively, "DS CPA". This policy applies to consumers who have, or have had, a customer relationship with one or more of the companies affiliated with "DS CPA,"

For purposes of this Privacy Policy, "Personal Information" is data specifically about you, which you typically provide on a voluntary basis. Personal Information does not include aggregate or combined information, which is data related to you but does not identify you specifically.

Please read the following information carefully to understand DS CPA's policies about protection and use of Personal Information. The types of Personal Information we collect and share depend on the product or service you have with us.

### **Information Collection**

We collect and maintain certain information from you, including Personal Information, in connection with opening and servicing your account. In the course of serving you, we collect certain Personal Information about you from a variety of sources, such as:

- Information you provide to us on applications or forms, including our websites, such as your name, address, Social Security number, birth date, assets and income;
- Information we receive from an outside company, such as a credit bureau, regarding your creditworthiness and credit history if you apply for credit products; or
- Information about your transactions or experiences with DS CPA, including interactions with our customer service staff.

### **Information Use and Disclosure**

Within DS CPA:

The Personal Information we collect is used to service your accounts and help you meet your financial goals. Personal Information may be used or shared within DS CPA for a number of purposes, such as:

- For our everyday business purposes such as to process your transactions and maintain your account(s);
- To protect your account(s) from unauthorized access or identity theft;
- To process your requests such as trading securities or insurance purchases;
- To provide you with customer service by responding to questions and requests you may have regarding your account(s) or the services provided through DS CPA, notifying you of updates, or contacting you otherwise when necessary;
- To provide you information about financial services and products that can help you meet your needs now and in the future, and to determine your eligibility to receive such products and services offered through DS CPA; and

- To improve the products and services offered through DS CPA, including internal market research or studies or to ask you to participate in surveys.

With Non-affiliated Third Parties:

We share Personal Information with non-affiliated third parties providing services for us when they are acting on our behalf. We may disclose all of the Personal Information we collect, as described above, with non-affiliated third parties that are acting on our behalf or are providing services for us, including:

- Companies that perform services for us, such as, data processors, technical systems consultants and programmers, check printers, and data aggregators; for the purpose of servicing your account through these systems or providing you information about your accounts (e.g., consolidated statements);
- Others as permitted or required by law such as government entities, in responding to regulatory inquiries, subpoenas and other legal processes or requests for information by authorities, and those with whom you have requested or authorized us to share information;
- Others in connection with an acquisition, merger, restructuring, sale or other transfer involving all or any portion of DS CPA; and
- Others to protect your safety and the safety of others, to assist us in fraud prevention or investigation, or if we determine a website or policy violation has occurred, or to enforce

DS CPA's rights and property.

It is important to note that when we do share Personal Information with outside companies that are performing services on our behalf, we do so only after that company has contractually agreed to maintain the confidentiality of the Personal Information, and to limit its use to the agreed-upon purpose. We do not share Personal Information with non-affiliated parties for the purpose of those companies marketing their own products and services to you.

Your DS CPA Advisor will obtain confidential information about you during the course of servicing your DS CPA accounts, and will retain that confidential information after leaving DS CPA. That information remains subject to contractual and regulatory restrictions that prohibit the use or disclosure of the information (except as permitted or required by law) without your explicit consent.

### **Information Protection**

We are committed to protecting customer information. The security and integrity of customer information is protected through procedures and technology designed for this purpose. For example:

- We limit employee access to customer information to those who need to know this information in order to service customer relationships;
- We have adopted an employee code of conduct, which includes standards to protect customer confidentiality;

- We require independent contractors and outside companies who work with us to adhere to privacy standards through their contracts with us;
- We maintain policies and procedures covering the proper physical security of workplaces and records;
- We protect against unauthorized access or alterations to customer data through standard technological means (such as backup files, virus detection, firewalls, and other computer software and hardware); and
- We comply with federal standards for physical, electronic and procedural protection of customer information.

The policies and practices described in this disclosure are subject to change, but we will communicate any significant changes to you as required by applicable law. These disclosures replace all previous notices or statements regarding this matter.

### **DS CPA is Committed to Your Privacy**

Respect for our customers' privacy has long been valued at DS CPA. Not only is it what our customers expect, it's the right way to do business. The trust of our customers is our most valuable asset and the reason we are in business. This trust is built, in part, upon our handling of your Personal Information.

In an age of electronic commerce and communication, the need for a strong commitment to the protection of consumer information is critical. Although technology has changed the way information is gathered, used and stored, the importance of preserving the confidentiality of information remains a core value to DS CPA.

### **Tips to Help Protect Your Account Information**

#### Assistance to Victims of Identity Theft

If you suspect that someone has had unauthorized access to your account with us, please notify us immediately so we can take action to protect you. Call DS CPA Risk Management at (757) 285-7272.

In addition, if you suspect that someone has had unauthorized access to your accounts, or access to your personal identifying information such as your Social Security number or credit card information, you should report the crime to your local law enforcement agency and to the Federal Trade Commission (FTC). To speak with a trained FTC telephone counselor, call toll-free at (877) IDTHEFT or (877) 438-4338.

Or, visit

[www.ftc.gov/idtheft](http://www.ftc.gov/idtheft) for additional consumer education materials.