



# **Privacy Policy**

SPG is bound by federal law that gives clients the right to limit some but not all sharing of nonpublic personal information (NPI). It also requires us to tell you how SPG collects, shares, and protects your NPI. Please read this notice carefully to understand what we do.

#### TYPES OF NONPUBLIC PERSONAL INFORMATION SPG COLLECTS

SPG collects NPI about you that is either provided to us by you or obtained by us with your authorization. This can include but is not limited to your Social Security number, date of birth, banking information, financial account numbers and/or balances, and sources of income.

## REASONS WHY SPG COLLECTS YOUR NONPUBLIC PERSONAL INFORMATION

We will collect your information to:

- Open an account
- To provide you with advice or make a recommendation about your investments
- To make deposits or withdrawals from your account
- Complete carrier or custodian forms

#### PARTIES TO WHOM SPG DISCLOSES INFORMATION

SPG shares your NPI with parties whose use of your information is required for us to provide you with the services that it offers and to execute the responsibilities SPG maintains as a fiduciary, as well as any necessary compliance with legal and regulatory organizations. These parties include, but are not limited to:

- Affiliates,
- Non-affiliated third parties who do not use your information for marketing purposes,
- Co-Providers/third party money managers,
- Financial custodians,
- Insurance carriers,
- Essential SaaS providers (e.g. CRM, Document Storage, Financial Planning, etc.),
- The Securities Exchange Commission, local, state and federal law enforcement (upon request).

### FEDERAL LAW GIVES YOU THE RIGHT TO LIMIT SOME SHARING

Reasons we can share your NPI	Does SPG Share?	Can You Limit Sharing?
For our everyday business purposes – such as to process your transactions, maintain your account(s), respond to court orders and legal investigations.	Yes	No
For our marketing purposes – to offer our products and services to you	Yes	No
To solicit reviews from clients - Responses to these requests may be used by SPG in marketing materials and other communications, and in so doing, SPG may identify the applicable person(s) as a current or former client of SPG.	Yes	Yes - until the second day after leaving a review.
For joint marketing with other financial companies	Yes	No
For our affiliates' everyday business purposes – about your creditworthiness	Yes	Yes
For our affiliates' everyday business purposes - information about your transactions and information	Yes	No
For non-affiliates' everyday business purposes – information about your creditworthiness	Yes	No
For our affiliates to market to you	Yes	Yes
For non-affiliates to market to you	No	We don't share

State laws and individual companies may give you additional rights to limit sharing.

Definitions	
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies. Our affiliate is Joe Maas - CIO of SPG Advisors and owner of Synergy Financial Services, Inc.
Non-Affiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies.
Joint marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

#### INFORMATION BY TEXT VIA MOBILE NUMBER

We need your consent to send text messages. On any forms where we ask for your mobile number, you'll have the option to agree to receive text messages. If you decide later that you no

longer want to receive texts, simply reply "Stop" to opt out. Message frequency may vary, standard data rates may apply, and carriers are not responsible for undelivered messages.

#### WHEN AND TO WHOM WILL YOUR INFORMATION BE SHARED?

If you are a new customer, SPG may begin sharing your NPI within 30 days of signing our agreement in order for us to begin providing you with financial management services. When you are no longer our customer, SPG may continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing. Your choices will apply to everyone on your account that is held jointly with someone else.

#### PROTECTING THE CONFIDENTIALITY OF CURRENT AND FORMER CLIENT'S NPI

To protect your NPI from unauthorized access and use, SPG uses security measures that comply with federal law. These measures include electronic data encryption, management of data access, physical security for devices and paper documents, internal procedures, and secure disposal of data, devices, and paper records.

Your privacy, our professional ethics, and the ability to provide you with quality financial services are very important to us. If you choose to limit sharing, please notify us immediately by calling our office at 425-821-9442, sending an email to <u>admin@myspg.com</u>, or mailing the form below to our office.

Mark any/all you want to limit:
<ul> <li>Do not share information about my creditworthiness affiliates for their everyday business purposes.</li> <li>Do not share my personal information with affiliates to market their services and products to me.</li> <li>Do not identify me as a client with your firm when I leave a review online.</li> <li>Do not share my personal information with non-affiliates to market their services and products to me.</li> </ul>
Mail to: Sound Planning Group 11411 NE 124th St Suite 255 Kirkland, WA 98034