Privacy Policy

October 2026

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.

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. SPG (also referred to as "we", "our" and "us") protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

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. This also includes customer information received digitally from external custodians and authorized third-party data transfers.

REASONS WHY SPG COLLECTS YOUR NONPUBLIC PERSONAL INFORMATION

We will collect your information strictly for either of the following purpose/s:

- Open an account
- Provide you with advice or make a recommendation about your investments
- 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. All such third-party providers are contractually or legally bound to maintain adequate administrative, technical, and physical safeguards and are obligated to adhere to strict data-security and emergency breach-reporting protocols. These parties include, but are not limited to:

- Affiliates, a person that directly, or indirectly through one or more intermediaries, controls or is controlled by, or is under common control with, the person specified in this Policy.
- 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	Yes
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
For joint marketing with other financial companies	Yes	Yes
For our affiliates' everyday business purposes – about your creditworthiness	Yes	Yes
For our affiliates' everyday business purposes - information about your transactions and experiences	Yes	No
For non-affiliates' everyday business purposes – information about your creditworthiness	Yes	Yes
For our affiliates to market to you	Yes	Yes
For non-affiliates to market to you	No	We don't share

Some states provide additional rights to limit sharing beyond federal law. Please contact us for more information on how state laws apply to your situation. We may share your personal information with non-affiliated financial companies subject to the strict provisions of the Joint Marketing Agreement/s made known to you and where consent is obtained for presenting an offer on co-branded financial products.

Definitions	
Affiliates	"Affiliate" means any person that is directly or indirectly, through one or more intermediaries, Controlling, Controlled by, or under common Control with the one of the Parties hereto. For purposes of this definition, "Control" shall mean possessing, directly or indirectly, the power to direct or cause the direction of the management, policies, and operations of a person, whether through ownership of voting securities, by contract, or otherwise. Further, for purposes of this Policy, Joe Maas-CIO of SPG Advisors and owner of Synergy Financial Services, Inc., shall be considered an affiliate.

Non-Affiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies. Non-affiliates might include third-party service providers, such as marketing firms or external custodians.
Joint marketing	A formal agreement between non-affiliated 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. You can also contact us at 425-821-9442 or admin@myspg.com to limit sharing of your NPI for other purposes. Message frequency may vary, standard data rates may apply, and carriers are not responsible for undelivered messages. Text messaging opt-in data and consent will not be sold or shared with third parties or affiliates for their marketing or promotional purposes. This information is used solely for the purpose of sending text messages as authorized by you.

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. These protections apply format-agnostically across all corporate networks, cloud-based applications, multi-factor authentication (MFA) protocols, and remote work environments.

NOTICE FOR CHANGES IN POLICY

SPG may update this Privacy Policy from time to time to reflect changes in our practices or legal requirements. In the event of significant and material changes, we will provide you with a written notification sent through email or a mail correspondence sent to your declared address. Because our data-sharing habits involve marketing, joint marketing, and external client review tracking, the firm does not qualify for the annual notice delivery exemption; we will deliver an updated copy of this notice to you on an annual basis.

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, sending an email, or mailing the form below.

QUESTIONS, FEEDBACK, OR OPT-OUT REQUESTS?
If you have any questions, concerns, or feedback regarding this notice, or wish to execute an opt-out choice, please contact our Chief Compliance Officer (CCO):

- Attention: Chief Compliance Officer
- Phone: 425-821-9442
- Email: admin@myspg.com

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Opt-Out Mail in Form	
Your name: _____ Your Address: _____	
	Mark any/all you want to limit: ☐ Do not share information about my creditworthiness affiliates for their everyday business purposes. ☐ Do not share my personal information with affiliates to market their services and products to me. ☐ Do not identify me as a client with your firm when I leave a review online. ☐ Do not share my personal information with non-affiliates to market their services and products to me. Mail to: Sound Planning Group 11411 NE 124th St Suite 255

	Kirkland, WA 98034