

## **The Bradford Financial Center, LC Privacy Notice**

Bradford Financial Center, LC is an investment adviser registered with the Securities and Exchange Commission. Our policy is to respect our client's personal information and maintain the highest level of confidentiality with regard to all information we collect regarding our clients.

We do not sell personal information about our clients to anyone. We will not share personal information about our clients with other companies unless we need to share the information in order to provide a product, service or quote that a client has requested. Unless we tell clients otherwise, these other companies do not have the right to use clients' personal information obtained from our firms in any manner beyond what is required to provide the client's requested product or service. Our firm limits the collection of personal information to what is necessary to administer our business and to deliver our products and services to our clients.

### **Information We Collect**

Primarily, *you* provide us with a majority of the information we collect in the course of acting as your financial planner and/or investment advisor. Information collected may relate to your finances, employment and health as well as publicly available information about you. Listed below are a few examples of information we collect.

- Personal information such as name, address, phone number, date of birth and social security number.
- Financial information such as income, net worth, risk tolerance, account numbers, tax bracket, assets and liabilities.
- Personal family information such as names, addresses and dates of birth for family members.
- Personal health information such as health conditions, recent surgeries, treatments, etc.

We also collect information about your transactions with us such as insurance premiums and policy numbers, investment brokerage account numbers and retirement plan information.

### **Information Collection Procedure**

Personal information we collect about you might come from several different sources-examples of those sources are as follows:

- Directly from you via telephone calls, meetings, etc.
- Information supplied through contracts, agreements, insurance and investment brokerage account applications or various other forms.
- Information provided by nonaffiliated third parties such as your accountant, attorney or other professionals.
- Information provided by members of your family (spouse, children, etc.).
- Information received directly from third parties such as security brokerage firms, insurance companies, mutual fund companies and private institutional portfolio managers.

### **Information We Disclose**

We do reserve the right to disclose or report personal information in limited circumstances to third parties that require access to your personal information. The categories of nonpublic personal information that we collect from a client depend upon the scope of the client engagement. It will include suitability information



about you and information about your investment holdings and transactions between you and third parties. It may include health information about you to the extent it is needed for the financial planning process.

In the normal course of business we may share your personal information with the following individuals and entities:

- Individuals with whom you have directed us to speak with – accountant, attorney, mortgage lender, other professionals, including insurance agencies and agents and family members.
- Regulators such as federal or state examiners when we are required to disclose your information by law.
- Accountants and auditors hired by our firm to perform accounting, audits, tax work and required examinations.
- Other firms with whom either you or our firm has contracted for operational or investment management services.
- Consultants we employ to review our business and regulatory practices (including computer consultants).
- Federal regulations permit us to share information about you with a brokerage firm in order to execute securities transactions on your behalf.

**How we use this information:**

We use this information to conduct business with you. At no time do we sell your information. And we share it only when it is necessary to conduct business with you.

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

**Protection of Your Confidential Information**

Our firms’ policies require that employees with access to confidential client information may not use or disclose the information except for business use. Access to client information is restricted to our employees, affiliates, representatives and agents with a business reason for access to such information. We safeguard information according to established security standards and procedures and train our employees and representatives to understand and comply with these protections.

**Privacy Policy Changes**

Bradford Financial Center, LC reserves the right to update and change our policies. If we do make any changes we will notify you in writing. In addition, you will be provided with the firms’ most current privacy notice at least annually.

**How to Contact us with Privacy Questions**

If you have any questions regarding our privacy policy, please contact us by:

- Phone at: (515) 532-6661 or
- Mail at: The Bradford Financial Center, LC  
215 North Main Street, PO Box 540  
Clarion, IA 50525