

 **Thalheimer Financial Planning**  
Fee-Only Financial Planning and Advice

## Privacy Policy

As an independent financial planning firm, Thalheimer Financial Planning, LLC (“TFP”) is committed to safeguarding the confidential information of all current, former, and potential clients. All personal information provided to our firm is held in the strictest confidence. These records include personal information we collect from you in connection with any services or potential services provided by TFP. We have never disclosed information to nonaffiliated third parties, except as required by law, by your consent, or in order to allow approved vendors to provide services to TFP. If we were to anticipate such a change in firm policy, we would be prohibited under the law from doing so without advising you first. We use your information in helping you meet your personal financial goals while guarding against any real or perceived infringements of your rights of privacy. Our policy with respect to personal information about you is listed below:

### Information Kept Private; Sharing Limited to Need to Know

- Access to your information is limited. Only employees, agents, and approved vendors who have a business or professional reason for knowing your information are allowed access.
- We do not share information with nonaffiliated parties except as required or permitted by law or by your consent. For unaffiliated third parties that require access to your personal information, including financial service companies, consultants, auditors, and certain vendors, we also require strict confidentiality in our agreements with them and expect them to keep this information private. For example, federal and state regulators may review firm records as permitted under law. Federal regulations permit us to share a limited amount of information about you so that our firm can discuss your financial situation with your accountant or lawyer.
- On occasion, TFP may enlist the assistance of data entry firms to assist in creating Financial Planning documents and for general administrative work. Your information will only be provided after the vendor has been properly vetted and signed a confidentiality agreement with TFP. The information provided will be limited strictly to that which is necessary for the vendor to properly perform its duties.
- TFP and Diane MacPhee of DMac Consulting Services have entered into a business continuity arrangement. In the event Steven Thalheimer of TFP dies unexpectedly or becomes incapacitated, Ms. MacPhee shall take steps necessary to notify the clients of TFP of Mr. Thalheimer’s unavailability. As a result of this relationship, Ms. MacPhee may have access to certain non-public, confidential information about you. If clients or prospective clients have any questions or concerns about this business continuity relationship, please contact Steven Thalheimer.
- We do not provide your personally identifiable information to mailing list vendors or solicitors.

### Secure Environment

- We maintain a secure office and computer environment to ensure that your information is not placed at unreasonable risk.

### Categories of Information Collected

- The categories of nonpublic personal information that we collect from a client depend upon the scope of the client engagement. These categories may include information:
  - about your personal finances and insurance;
  - about your personal goals and health to the extent needed for the planning process;
  - about transactions between you and third parties; and
  - from consumer reporting agencies.

### Maintenance of Information

- Personally identifiable information about you will be maintained during the time you are a client, and for the required time that such records are required to be maintained by federal and state securities laws, and consistent with the CFP Board Code of Ethics and Professional Responsibility.