



# Privacy Policy

Toole Financial, LLC ("TF") recognizes that our relationships with current and prospective clients are based on integrity and trust. We work hard to maintain your privacy and to preserve the private nature of our relationship with you. We place the highest value on the information you share with us. We will not sell your personal information.

We want our clients to understand what information we collect, how we use it, and how we protect your personal information.

## Why We Collect Your Information

We gather information about you so that we can:

- Help design and implement the investment and financial planning related services we provide you; and
- Comply with the Federal and State laws and regulations that govern us.

## What Information We Collect and Maintain

We may collect the following types of "nonpublic personal information" about you:

- Information from our initial meeting or subsequent consultations about your identity, such as your name, address, social security number, date of birth, and financial information;
- Information that we generate to service your financial needs; and
- Information that we may receive from third parties in connection with the services we provide you.

## What Information We Disclose

We are permitted by law to disclose nonpublic personal information "NPI" about you to unaffiliated third parties in certain circumstances. Unaffiliated third parties are companies not related to TF by common ownership or control and could be financial and nonfinancial companies. TF may disclose your NPI: (1) to individuals and/or entities not affiliated with TF, including, but not limited to, third-parties that assist in the supervision or management of your account(s) (i.e. account custodian, record keeper, attorney, etc.); (2) to unaffiliated service providers contracted by us for everyday business purposes in order for us to perform the duties of your engagement with TF (i.e. CRM platform (Wealthbox), financial planning software (Right Capital), archiving technology (XY Archive), workflow software (fpPathfinder), messaging platform (MyRepChat), payment processor (AdvicePay), compliance task management platform (SmartRIA), etc.); (3) to your authorized representative or power of attorney; (4) when we receive your prior consent; (5) as otherwise permitted to do so in accordance with the parameters of applicable federal and/or state privacy regulations. If we do not receive permission to share this NPI, then we are prohibited from sharing this NPI with unaffiliated third parties.

In the event that TF has a change to its client privacy policy that would allow it to disclose NPI not covered under applicable law, TF will allow its clients the opportunity to opt-out of such disclosure.

**I acknowledge disclosure of nonpublic personal information to unaffiliated third parties in accordance with (1-5) directly above.**

Client Signature(s) \_\_\_\_\_



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## How We Protect Your Personal Information

Privacy has always been important to TF. We restrict and limit access to client information only to those who need to carry out their business functions. We safeguard client information by preventing its unauthorized access, disclosure, or use. We maintain physical, electronic, and procedural safeguards to protect your confidential personal information. Arrangements with companies or independent contractors not affiliated with TF will be subject to confidentiality agreements.

## Former Clients

Even if we cease to provide you with financial services, our Privacy Policy will continue to apply to you, and we will continue to treat your nonpublic personal information with strict confidentiality. We maintain all records regarding all former clients for the retention period required by law.

## Notice of Incapacitation: Client Opt-In

We have adopted a Business Continuity Plan that outlines the strategies and plans that will be used by TF during a significant business disruption, including loss of TF's key principal. In the event of death or incapacitation of the key personnel of TF, TF has a signed Confidentiality Agreement with Jennifer Toole, our Responsible Party, in order to share client contact information (limited to client's name, address, phone number, and email address) solely for the purpose of informing clients of the death or incapacity of TF's principal in order for clients to expeditiously make any necessary changes to their investment account(s) and/or financial plan.

Client Initial(s) \_\_\_\_\_

## Contact Us

Clients are encouraged to discuss any questions regarding privacy policies and procedures directly with Edward Toole, Chief Compliance Officer of TF. Please contact Edward Toole at (347) 880-0468.