



## **Client Privacy Policy**

Revised March 27, 2024

Downshift Financial, LLC (“DSF”) 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. DSF will not disclose your personal information to anyone unless it is required by law or at your direction. We will not sell your personal information. DSF will provide this privacy statement to all clients annually.

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 financial planning and investments 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 (“NPI”) 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.
- Information that we may receive from third parties with respect to your financial profile.

### **What Information We Disclose**

We are permitted by law to disclose NPI about you to unaffiliated third parties in certain circumstances.

For example, to provide financial planning and/or investment management services to you, we may disclose your personal information in limited circumstances to various service providers, such as our custodian (Charles Schwab & Co., Inc) or independent contractors hired by DSF. Arrangements with companies or independent contractors not affiliated with DSF will be subject to confidentiality agreements.

Additionally, if a Financial Planner / Financial Advisor leaves DSF to join another firm, they may be permitted to retain copies of limited client information so that they may solicit your business at their new firm. Such information may include:

- Names;
- Addresses;
- Phone numbers;
- Email addresses; and
- Account titles.

**“Opting-Out” of Third Party Disclosures:** If you do not want your Financial Planner / Financial Advisor to retain copies of your client sensitive information if he or she leaves DSF to join another firm, please initial below:

Initial to Opt-Out \_\_\_\_\_

Initial to Opt-Out \_\_\_\_\_

Otherwise, DSF will not disclose any personal information about you or your account(s) unless one or more of the following conditions is met:

- We receive your prior written consent;
- We have documentation that the recipient is your authorized representative; or
- We are required by law to disclose information to the recipient

**How We Protect Your Personal Information**

Privacy has always been important to DSF. We restrict and limit access to client information only to those who need it to carry out their business functions. We educate employees about safeguarding client information and preventing its unauthorized access, disclosure, or use. Employees are required to acknowledge their acceptance and understanding of the privacy policy in writing. We maintain physical, electronic, and procedural safeguards to protect your confidential personal information. However, we cannot guarantee unauthorized access will never occur. Unless caused by DSF’s negligence or misconduct, you agree to defend, indemnify, and hold DSF harmless from and against any and all losses, claims, suits, actions, liabilities, damages, obligations, costs, and expenses (including reasonable attorneys’ fees and costs) which you suffer as a result of unauthorized access of your information.

\_\_\_\_\_  
Client Name

\_\_\_\_\_  
Client Name (if applicable)

\_\_\_\_\_  
Client Signature

\_\_\_\_\_  
Client Signature (if applicable)

\_\_\_\_\_  
Date

\_\_\_\_\_  
Date (if applicable)