

## Privacy Policy

Your relationship with us is based on trust and confidence. To fulfill our responsibilities to you, we require that you provide current and accurate financial and personal information. You deserve to expect that we will protect the information you have provided in a manner that is safe, secure and professional. We are committed to protecting your privacy and to safeguarding that information.

1. ***Safeguarding Client Information:*** We collect non-public client data in checklists, forms, in written notations, tax returns and in documentation provided to us by our clients for evaluation, registration, licensing or related consulting services. We also create internal lists of such data.

During regular business hours, access to client records is monitored so that only those with approval may access the files. During hours in which we are not in operation, client records will be secured.

No individual who is not so authorized shall obtain or seek to obtain personal and financial client information. No individual with authorization to access personal and financial client information shall share that information in any manner without the specific consent of a firm principal. An employee's failure to observe Pacific Park Financial, Inc. procedures regarding client privacy will result in disciplinary action or termination.

2. ***Sharing Nonpublic Personal and Financial Information:*** We are committed to the protection and privacy of our clients' personal and financial information. We will not share such information with any affiliated or nonaffiliated third party except:
  - a. When necessary to complete a transaction in a client account, such as with the clearing firm or account custodians;
  - b. When required to consult or service a client account;
  - c. To resolve client disputes or inquiries;
  - d. With persons acting in a fiduciary or representative capacity on behalf of the client;
  - e. With rating agencies, persons assessing compliance with industry standards, or to the attorneys, accountants and auditors of the firm;
  - f. In connection with a sale or merger involving Pacific Park Financial, Inc.;
  - g. To protect against or prevent actual or potential fraud, identity theft, unauthorized transactions, claims or other liability;
  - h. To comply with federal, state or local laws, rules and other applicable legal requirements;
  - i. In connection with a written agreement to provide investment management or advisory services when the information is released for the sole purpose of providing the products or services covered by the agreement;
  - j. In any circumstances with the client's instruction or consent; or
  - k. Pursuant to any other exceptions enumerated in the California Information Privacy Act.
3. ***Opt-Out Provisions:*** It is not our policy to share nonpublic personal and financial information with affiliated or unaffiliated third parties except under the circumstances noted above. Since sharing under the circumstances noted above is either mandated by law or is necessary to provide service to our clients, there are no allowances made for clients to opt out.