



## FINANCIAL PLANNING

### Privacy Policy

As an *independent* financial planning firm, MainStreet Financial Planning, Inc. (“MSFP”) is committed to safeguarding the confidential information of all current (customers), former (customers), and potential clients (consumers).

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 MSFP.

We never disclose information to nonaffiliated third parties, except as required by law or by your consent. 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 non-public personal information is limited. Only employees, regulators or our contract para-planners who have a business or a 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, and auditors, 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 with your express permission.

We do not provide your personally identifiable information to mailing list vendors or solicitors.

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### **Secure Environment**

We maintain a secure office and computer environment to ensure that your information is not placed at unreasonable risk. We ask that clients and prospective clients protect the information they transmit to us using secure means including encryption and password protection if using electronic means. We pledge to do the same. We will provide suggestions that to the best of our knowledge will protect personal information during electronic transmission, but it will be up to the transmitter to understand the risk of disclosure before engaging third party services providing encryption and password protection systems. We encourage use of bar coded delivery systems to track and document delivery of personal documents using USPS, FedEx and UPS systems that track and document delivery to the intended recipient. We pledge to do the same.

### **Categories of Information Collected**

The categories of nonpublic personal information that we collect from a client or prospective client depend upon the scope of the client engagement.

These categories may include information:

- about your personal finances and insurance;
- about your personal goals, dreams, 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 time period that such records are required to be maintained by federal and state securities laws, and consistent with the CFP Board of Standards Code of Ethics and Professional Responsibility.

MainStreet Financial Planning, Inc will provide its customers with its privacy policy on an annual basis and at any time, in advance, if our privacy policy is expected to change.

Contact us at:

MainStreet Financial Planning, Inc  
340 Lorton Ave, Ste. 215  
Burlingame, CA 94010  
888-897-6743  
[www.MainStreetPlanning.com](http://www.MainStreetPlanning.com)



## FINANCIAL PLANNING

**Vendor Service Providers MainStreet Financial Planning uses to deliver financial plans.**

**These are their Privacy Policies**

### **Money Guide Pro**

[www.moneyguidepro.com](http://www.moneyguidepro.com)

Money Guide Pro is the vendor we use to produce financial plans.

PIEtech<sup>SM</sup>, Inc. (PIE), the developer of MoneyGuidePro<sup>®</sup> and moneyguidepro.com, is committed to protecting your privacy and ensuring the security of your information on our website.

Our Privacy Policy has three key elements.

You were granted access to moneyguidepro.com by a financial advisor. This financial advisor and, if applicable, the firm with whom they are licensed, also has access to your personal information on moneyguidepro.com. Your advisor uses your personal information, in conjunction with our software, to provide customized financial planning reports for you. Your advisor's use of your data is governed by their firm's privacy policy. Please contact your financial advisor if you have questions about their firm's privacy policy.

Your financial advisor can authorize PIE to allow the exchange of data between moneyguidepro.com and other programs or websites that your advisor uses in their business, and your personal information can be included in these data exchanges. Except for data exchanges that have been authorized by your advisor, PIE does not disclose or share your personal information with any third party, unless required by law to do so (for example, to comply with a subpoena).



## FINANCIAL PLANNING

We use transport layer security (TLS) encryption, which is the industry standard for secure data transfer software, to ensure data you transmit through the Internet is protected against unauthorized access.

### **What Personal Information Do We Collect and How Do We Use It?**

When you register, we will ask you for your name, email address, and contact information, and you will be asked to select a password. You may also be asked to select a user name.

We use your name to personalize your reports generated by the system. We use your email address to confirm your subscription, user name and password, and to provide customer service. As a registered user, when you select the option to create or access your financial plans, we will recognize you by your user name and password (or e-mail address, as applicable). We may also use the contact information we collect to notify you about any new functions included in our software or new services offered by our website.

### **What Financial Information Do We Collect and How Do We Use It?**

To use our software, you or your financial advisor must input personal financial data for you and, if applicable, your co-client. The personal financial data required may include annual income, current values of and annual additions to investment assets, anticipated retirement expenses, and expected values of future assets such as lump sum distributions from pensions or inheritances. In many instances, these entries are optional. This personal financial information will be used by your financial advisor, in conjunction with our software, to develop financial, asset allocation, and income plan(s) or analyses for you.

### **"Cookies"**

"Cookies" are small files used by websites to store information on your computer. For moneyguidepro.com to work properly, your browser must be enabled to accept cookies. Our cookies contain information that identifies you during a session and allows the software to function. This information is not for sale or distribution.

### **How Do We Protect Your Information?**

When you access your financial data, we use a state-of-the-art secure server to keep all of your personal information as secure as possible. The transport layer security (TLS) encrypts all information you input before it is sent to us, and all data we collect is protected against unauthorized access. This approach helps ensure that your personal and financial information remains safe and private.

### **Your Consent**



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By using our website, you consent to the collection and use of the information described above by moneyguidepro.com. Should we make any changes to our privacy policy, we will post those changes on this page, and your continued use of our website is your consent to those changes.

You also acknowledge that PIE may aggregate data from its users and subscribers for the purpose of better understanding its user base and/or to research potential changes in content and services. PIE may use this collective information for product research or marketing demographics, but we do not disclose, sell, or distribute any information to a third party where such information could indicate directly or indirectly any individual's financial information.

### Sharefile

[www.sharefile.com](http://www.sharefile.com)

Citrix ShareFile respects your privacy. This Online Privacy Policy describes the privacy practices for ShareFile's website ([www.sharefile.com](http://www.sharefile.com) or the "Site"). It does not cover information that is stored using ShareFile's services.

If you have questions or complaints regarding our privacy policy or practices, please contact us here. If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact our U.S.-based third party dispute resolution provider (free of charge) at <https://feedback-form.truste.com/watchdog/request>.

ShareFile participates in and has certified its compliance with the EU-U.S. Privacy Shield Framework. ShareFile has committed to subjecting all personal data received from European Union (EU) member countries, in reliance on the Privacy Shield Framework, to the Framework's applicable principles. To learn more about the Privacy Shield Framework, visit the U.S. Department of Commerce's Privacy Shield List <https://www.privacyshield.gov/list>.

ShareFile is responsible for the processing of personal data it receives, under the Privacy Shield Framework, and subsequently transfers to a third party acting as an agent on its behalf. ShareFile complies with the Privacy Shield Principles for all onward transfers of personal data from the EU, including the onward transfer liability provisions.

With respect to personal data received or transferred to the Privacy Shield Framework, ShareFile is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission. In certain situations, ShareFile may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

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Under certain conditions, more fully described on the Privacy Shield website <https://www.privacyshield.gov/article?id=How-to-Submit-a-Complaint>, you may invoke binding arbitration when other dispute resolution procedures have been exhausted.

ShareFile complies with the U.S. – Swiss Safe Harbor Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal data from Switzerland. ShareFile has certified that it adheres to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement. To learn more about the Safe Harbor program, and to view ShareFile's certification, please visit <https://safeharbor.export.gov/swisslist.aspx>.

### Cognito Forms

Questionnaire tool

[www.CognitoForms.com](http://www.CognitoForms.com)

Cognito, LLC ("Cognito", "us" "we" or "our") respects your privacy and is committed to maintaining the privacy and confidentiality of personal data we collect. This Privacy Statement describes how Cognito or businesses operating under a different brand name but doing business as Cognito, collect information about you through the websites located at \*.cognitoapps.com and \*.cognitoforms.com (the "Sites"). Although, some of these Sites may be branded using a different name, i.e. Cognito, users should refer to this Privacy Statement as the controlling document regarding your privacy for any of the information you provide to us through the Sites. The purpose of our Privacy Statement is to describe the ways we collect information from and about you when you sign up to receive information about our products and related services, to provide information to you to explain the ways in which the information is used by Cognito and to explain the ways in which Cognito protects your information.

Cognito offers its customers a web based software application which provides customers the functionality to create and build customized online forms (the "Services"). These online forms can be customized by customers for a variety of purposes and to display many different types of data. All the information you share with us on our Sites or which may be contained within the customized online forms created and generated by your use of the Services is governed by our Terms of Service.

By visiting our Sites or otherwise providing your personal information to us via any other means, you are accepting and consenting to the practices described in this Privacy Statement. For purposes of this Privacy Statement, the term "visitor" includes visitors to our Sites who are not yet customers, those who become customers ("Account Holders"), as well as those who do not become Account Holders, whether you upload information to our Sites, download it, or are merely visiting our Sites.



## FINANCIAL PLANNING

### DATA WE COLLECT

When you visit our Sites you may choose to engage with us by providing us with your organization name, telephone number, email address and first and last name. We collect this information when you choose to contact us for more information about the Services, when you email us directly with questions or request more information about the Services and when you choose to become an Account Holder.

### USE OF INFORMATION

The personal information we collect from you is relevant for the purposes for which it is to be used. Cognito takes reasonable steps to ensure that data is reliable for its intended use, accurate, complete, and current. We may use personal information to provide the Services you've requested for purposes of opening an account and registration of you as an Account Holder. We may also use personal information for auditing, research and analysis to operate and improve the Cognito Sites. We may use third parties to assist us in processing your personal information, and we require that such third parties comply with our Privacy Statement and any other appropriate confidentiality and security measures. We may use certain other information collected from you to help diagnose technical problems, administer the Cognito Sites, and improve the quality and types of services delivered. We use cookies to assist in delivering the Services and to provide a positive and personalized user experience. Our cookies are used to identify unique visitors to our sites and to provide you with easy access to the Services and navigation on the Sites when you enter your log in information on the Sites. If you have your browser set to reject cookies, your usage of the Services is likely to be interrupted. Our web sites use Google Analytics, which is a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses cookies to help analyze how individuals use the Services. The non-personal information generated by the cookie about your use of the Sites will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the Sites, compiling reports on Site activity for our purpose, evaluation and providing other services relating to Site activity and Internet usage. Google will not associate your IP address with any other data held by Google. You may disable cookies within your browser as described above, however please note that if you do this you may not be able to use the full functionality of the Sites. By using our Sites you consent to the processing of data about you by Google in the manner and for the purposes set out above. For certain browsers, you can also prevent Google from collecting information (including your IP address) via cookies and processing this information by downloading this browser plug-in and installing it: <http://tools.google.com/dlpage/gaoptout>.

### DISCLOSURE OF PERSONAL INFORMATION

Personal information we gather is for internal use only and we will not authorize the release of this information to anyone outside Cognito (except to third party service providers of Cognito who perform functions on our behalf but, in such cases, personal information will only be shared to the extent reasonably necessary for third party service providers to perform their functions and they will not be



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authorized to use it for any other function) unless you have consented to such disclosure. Should you breach our Terms and Conditions, or if we are under a duty to disclose or share your personal data in order to comply with any legal obligations, we may disclose your information to a relevant authority. This may include exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction. In particular, we may release the information we collect to third parties when we believe it is appropriate to comply with the law, to enforce our legal rights, to protect the rights and safety of others, or to assist with industry efforts to control fraud, spam or other undesirable conduct. We may release the information we collect to third parties, where the information is provided to enable such third party to provide services to us, provided that the third party has agreed to use at least the same level of privacy protections described in this Privacy Statement, and is permitted to use the information only for the purpose of providing services to us.

### OPTING OUT OF COMMUNICATIONS

Cognito gives you an opportunity to choose to opt-out of personal data being disclosed to third parties for a purpose incompatible with the purpose for which it was originally collected (except for meeting applicable legal requirements or permitting third party service providers who perform functions on our behalf as described in the Disclosure of Personal Information section of this Privacy Statement), including your opting out of receiving future marketing mailings. We will not use your contact information to correspond with you about our Services if you ask us not to do so. Please send your request to [optout@cognitoforms.com](mailto:optout@cognitoforms.com) or write us at the address listed in the Questions section below. Please note that it may take up to thirty (30) days to remove your contact information from our marketing communications lists, so you may receive correspondence from us for a short time after you make your request.

### SECURITY OF YOUR INFORMATION

In order to provide you with the Services, Cognito utilizes Microsoft's Windows Azure as platform as a service ("PAAS") to store the personal information you provide to us when you use our Services. When you enter your personal information on our Sites it is retained by Microsoft on the Windows Azure platform. Once you enter your information on our Sites, Cognito is not the primary controller of your personal information. The Windows Azure platform utilizes industry best practices with respect to privacy and security and Cognito relies exclusively on the Windows Azure platform to secure your personal information once it leaves the Cognito environment. You can learn more about the security measures Windows Azure utilizes to protect your personal information here at [www.windowsazure.com/trustcenter](http://www.windowsazure.com/trustcenter). Cognito is committed to the industry best practices approach concerning security measures to prevent the loss, misuse and alteration of the information for which we may have access through Cognito's use of the Windows Azure platform. Within Cognito's environment, we use various security measures to protect the information we access through Windows Azure, as appropriate to the type of information collected, including assigning unique user names and passwords, encryption in transit, firewalls, and access controls. The textual information you share when you choose



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to engage with us, and the textual information you enter when you use the Services as an Account Holder, are SSL encrypted during transmission and Cognito's Windows Azure sites are accessible only by Cognito employees, contractors and agents on a need to know basis and who have entered into and are bound by a confidentiality and nondisclosure agreement with Cognito. Of course, no guaranty can be made that your information and data will be secure from intrusions and unauthorized release to third parties.

### **COMPLIANCE WITH CHILDREN'S ONLINE PRIVACY PROTECTION**

Cognito does not market Services and does not knowingly collect any personal information from children under 13 years of age.

### **RIGHT TO ACCESS, UPDATE OR DELETE YOUR PERSONAL INFORMATION**

If your information changes you may contact us at [privacy@cognitofirms.com](mailto:privacy@cognitofirms.com) about how to change your personal information. In the event you wish to delete or cancel your account the Account page on our website provides a simple no questions asked cancellation link. Any cancellation of your Account will result in the deactivation or deletion of your Account or your access to your Account, and the forfeiture and relinquishment of all content in your Account. This information cannot be recovered from us once your account is cancelled. Please be aware that we may for a time retain residual information in our backup and/or archival copies of our database. We will make reasonable commercial efforts to delete your information as soon as possible after you communicate that intention to us. For more information related to the deactivation or deletion of your account please review our Terms of Use. If you believe that any personal information we have about you is incorrect, or is, has been, or might be used inappropriately, please contact us at [privacy@cognitoapps.com](mailto:privacy@cognitoapps.com) and we will take steps to correct or delete the information, or restrict its use, as appropriate using commercially reasonable efforts as soon as reasonably practical.

### **VERIFICATION**

Cognito utilizes the self-assessment approach to assure its compliance with its Privacy Statement. Cognito regularly verifies that the Privacy Statement is accurate, comprehensive, prominently displayed, and completely implemented, and Cognito conducts its self-assessment on an annual basis to ensure that all relevant privacy practices are being followed. Appropriate employee training and internal procedures for periodically conducting objective reviews of compliance are in place. A statement verifying this self-assessment is signed by a corporate officer or other authorized representative at least once a year.

### **VISITING OUR WEBSITE FROM OUTSIDE OF THE UNITED STATES**



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If you are visiting our Sites from outside the United States, please be aware that your information may be transferred to, stored or processed in the United States, where our servers are located and our central database is operated. The data protection and other laws of the United States and other countries might not be as comprehensive as those in your country. By using the Services, you understand that your information may be transferred to third parties with whom we share it as described in this Privacy Statement.

### INQUIRIES OR COMPLAINTS

If you have a question or complaint about this Privacy Statement or our information collection practices, please contact us at [privacy@cognitofirms.com](mailto:privacy@cognitofirms.com) or write us at the address listed below in the Questions section of the Privacy Statement. We will investigate the matter and are committed to resolving any privacy concerns that you may have.

### Changes

Because the Web is an evolving medium, we may need to change our Privacy Statement at some point in the future, in which case we'll post the revised Privacy Statement on our Sites and update the "Last Updated" date above to reflect the date of the changes. By continuing to use our Sites or providing Cognito with your personal information after we post any such changes, you accept the Privacy Statement as modified. If necessary, we will provide additional information regarding any changes to this Privacy Statement as may be required by law. Your access of our Sites for the limited and exclusive purpose of reviewing this Privacy Statement does not constitute your acceptance of this Privacy Statement unless you make any further access or use of our Sites. This Privacy Statement is not intended to and does not create any contractual or other legal right in or on behalf of any party.

### Questis

Financial Wellness Platform

#### WHAT IS QUESTIS?

Questis, Inc. ("Questis") operates an online financial advisor on [www.myquestis.com](http://www.myquestis.com) and a blog, The Academy at [www.myquestis.com/academy](http://www.myquestis.com/academy). The Questis website and The Academy Blog and all content available thereon are collectively referred to herein as the "Site". This Privacy Policy describes how Questis treats personal information when you use the Site, including information you provide to us as a user ("User"). Additional rules may apply to you, as described in this Privacy Policy, if you are a User who is also a client of Questis ("Client").

#### PERSONAL INFORMATION



## FINANCIAL PLANNING

You become a User when you access the Site, pursuant to Questis's Terms of Use. Except as required by law or requested by regulatory authorities, Questis agrees to maintain your non-public information in strict confidence.

Questis restricts access to non-public personal information about Users to certain Questis employees who require that information in order to maintain and operate the Site. Questis may ask you for additional personal information, such as your name or picture, in order to provide personalized services to you. Questis stores, processes, and maintains data related to you in order to provide its products and services through the Site. Questis's uses for this data are described below.

When you use the Site, Questis's servers automatically record certain information about your use of the Site. Similar to other web services, Questis records information such as browsing activity, data displayed or clicked on (such as UI elements, ads, and links), and other information (such as browser type, IP address, date and time of access, cookie ID, and referrer URL). Along with cookies, Questis may also use third-party tracking technology, such as Google Analytics, to record similar information regarding you and your activity on the Site.

Questis is not directed to anyone under the age of 18. If a parent or guardian becomes aware that his or her child under the age of 18 has provided us with personally identifiable information without his or her consent, he or she should contact us at [info@myquestis.com](mailto:info@myquestis.com). If we become aware that a child under the age of 18 has provided us with personally identifiable information, we will delete such information from our files.

### USE OF INFORMATION

Questis maintains and processes your Questis account and its contents to provide Questis's products and services to you and to improve our services.

Questis's servers process the information you provide to Questis for various purposes, including but not limited to formatting and displaying your information, delivering related content, sharing community information, and other purposes relating to the Site.

If you are a Client, Questis may also process information for performing trades for your account, investing activity in your account and/or calculating your portfolio performance.

Questis may send you information related to Questis services, the blog, or your account if you are a Client. If you decide at any time that you no longer wish to receive marketing communications from us, please follow the "unsubscribe" instructions provided in the communications.

### INFORMATION SHARING AND ONWARD TRANSFER



## FINANCIAL PLANNING

We do not sell, rent, or otherwise share your personal information with any third parties except as permitted or required by law, such as when we reasonably believe it is necessary or appropriate to investigate, prevent, or take action regarding illegal activities, suspected fraud, frontrunning or scalping, situations involving potential threats to the physical safety of any person, or violations of our Terms of Use.

You understand and agree that any personal information that you provide through the Site and explicitly agree to share publicly might be made publicly available in Questis's discretion, and that other Users may use and reproduce such. We have no control over the use by other Users of the information that you voluntarily disclose to Questis for this purpose or to the public in general.

Questis maintains physical, electronic and procedural safeguards that comply with federal standards to guard Users' non-public personal information.

### **SPECIAL RULES FOR THE USE AND SHARING OF INFORMATION OF CLIENTS.**

If you wish to become a Client, we will ask you for certain information, including, but not limited to, your full legal name, contact information, birth date, SSN, citizenship, investment objectives, approximate net worth, and other regulatory disclosures that may be necessary. We require such information in order to be able to provide our services to Clients in accordance with the rules of regulatory bodies such as the Securities and Exchange Commission and FINRA. You may choose not to provide such information to us, but you will not be able to become a Client.

We may share the information required to become a Client with our brokerage partner solely for the purpose of allowing our brokerage partner to provide services to you.

### **YOUR CHOICES**

You may request deletion of personal information by emailing [info@myquestis.com](mailto:info@myquestis.com) and providing us enough information to identify your account and prove that you are the owner of the identified account. We will endeavor to act on these deletion requests as soon as reasonably practicable. Deletions take effect when we act on them. Residual information related to your account may remain for some time on our servers. If you are a Client you may request that we remove your personal information, and we will do so as soon as reasonably practicable. However, we may retain such information, as well as any data related to your trades, in accordance with applicable laws. In no case will we share any individual trading data unless required by regulators or other government bodies.

You may decline to provide personal information to Questis. Declining to provide personal information may disqualify you for Questis services and Site features that require certain personal information.

### **CHANGES TO THIS POLICY**



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This Privacy Policy may change from time to time. We will not reduce your rights under this Privacy Policy without your explicit consent, and we expect most changes will be minor. We will post any Privacy Policy changes on this page and, if the changes are substantial, we will provide a more prominent notice (including, for certain services, email notification of Privacy Policy changes).