

# CLIENT INFORMATION PRIVACY POLICY

Ensuring that our clients and others are confident we will manage their financial affairs and information expertly and confidentially is very important to the team at Faithward Advisors, LLC. Our clients have access to a broad range of products and services from basic planning to investments, insurance, and online account access. To deliver these products and services as effectively and conveniently as possible, we employ technology to manage and maintain certain client information.

We want to assure you that whenever information is used, we exercise discretion. The safeguarding of client information is an issue we take seriously. To affirm our continuing commitment to the proper use of client information, we have set forth the following Privacy Policy. This Privacy Policy guides us in serving the privacy needs of our clients.

- 1. Recognition of a Client's Expectation of Privacy:** We believe the confidentiality and protection of client information is one of our fundamental responsibilities. Thorough information is critical to providing quality service. We recognize and appreciate the trust you put in our ability to fulfill this responsibility.
- 2. Use, Collection, and Retention of Client Information:** We limit the use, collection, and retention of client information to what we believe is necessary or useful to conduct our business, provide quality service, and offer products, services, and other opportunities that may be of interest to our clients. Information collected may include, but is not limited to, name, address, telephone number, tax identification number, date of birth, driver's license number, employment status, annual income, and net worth.
- 3. Maintenance of Accurate Information:** We recognize the importance of complete and accurate records for each client. Therefore, procedures have been established to collect, maintain, and update client information in a timely manner.
- 4. Limiting Employee Access to Information:** Employee access to personally identifiable client information is limited to those with a business reason to know such information. Employees are educated on the importance of maintaining the confidentiality of client information as found in this Privacy Policy. Because of the importance of these issues, all Faithward Advisors, LLC employees are responsible for maintaining the confidentiality of client information. Employees who violate this Privacy Policy will be subject to disciplinary measures.
- 5. Protection of Information via Established Security Procedures:** We recognize that a fundamental element of maintaining effective client privacy procedures is to provide reasonable protection against the unauthorized access to client information. Therefore, we have established appropriate security standards and procedures to guard against any unauthorized access to client information. These procedures include, but are not limited to, the secure destruction of paperwork containing confidential client information.

## CLIENT INFORMATION PRIVACY POLICY (CONTINUED)

**6. Restrictions on the Disclosure of Client Information:** When it comes to sharing client information with other companies, we place strict limits on who receives specific information about client accounts and other personally identifiable data. We reserve the right to share information with such companies, if they provide a product or service that may benefit our clients. Whenever we do this, we share the minimum amount of information necessary for an outside company to offer its product or service. It is understood that the client is in agreement to allow Faithward Advisors, LLC to disclose personal financial information to any affiliated or non-affiliated third party.

We may also share information with unaffiliated companies that assist us in providing our products and services to our clients in the normal course of our business, when legally required or permitted in connection with fraud investigations and litigation, in connection with acquisitions and sales, and at the request or with the permission of a client.

**7. Maintaining Client Privacy in Business Relationships with Third Parties:** If we provide personally identifiable client information to a third party with which we have a business relationship, we will insist that the third party keep such information confidential, consistent with the conduct of our business relationship.

**8. Disclosure of Privacy Principles to Clients:** We recognize and respect the privacy expectations of our clients. We want our clients to understand our commitment to privacy in our use of client information. As a result of our commitment, we have developed this Privacy Policy that is made readily available to our clients. Clients who have questions about this Privacy Policy or questions about the privacy of their client information should call the Faithward Advisors office (717-560-8300 or 800-395-7660) or email us at [compliance@Faithwardadvisors.com](mailto:compliance@Faithwardadvisors.com).

We reserve the right to change this Privacy Policy and any of the policies or procedures described above, at any time without prior notice. This Privacy Policy is for general guidance, does not constitute a contract or create legal rights, and does not modify or amend any agreements we have with our clients.

*Please contact us **if** there are any changes in your financial situation or investment objectives or **if** you wish to impose, add, or modify any reasonable restrictions to the management of your account. Our current disclosure statement is set forth on Part II of Form ADV and is available for your review upon request.*

*Faithward Advisors, LLC is a Registered Investment Advisor. Securities offered through American Portfolios Financial Services, Inc. (Holbrook, New York, 631.439.4600), member FINRA, SIPC. Investment Advisory Services offered through Faithward Advisors, LLC. Faithward Advisors is not owned or operated by American Portfolios Financial Services.*

# DISASTER PREPAREDNESS POLICY

At Faithward Advisors, LLC, our clients are the priority. We want to assure you that there is a plan in place to maintain the level of service provided to you, even in the event of a disaster or emergency. Excerpts from our complete Disaster Preparedness Plan are provided so that you are aware of the steps we will take in an emergency situation.

## Emergency Contact Numbers

Trading / Account Management Concerns:  
Curtis D. Stoltzfus, VP, Financial Strategies  
Email: [cstoltzfus@Faithwardadvisors.com](mailto:cstoltzfus@Faithwardadvisors.com)  
Cell Phone: 717-368-9486

Operational / Service Concerns:  
Amy J. Malay, Director, Team Development  
Email: [amalay@Faithwardadvisors.com](mailto:amalay@Faithwardadvisors.com) Cell  
Phone: 717-723-8043

## Notification of Proper Authorities

After an emergency has been declared, the Disaster Team Leader (Adrian E. Young or designated representative) will notify the proper regulatory authorities of the nature of the emergency and the temporary location of the firm (if our current location is not viable). Additionally, the Director of Team Development will notify critical vendors and any other vendors as deemed necessary. The Disaster Team Leader will notify the firm's insurance company, if any personal injury has occurred.

## Client Records

Client agreements, contracts, profiles, and other documentation related to each client - as well as trading records, brokerage statements, and confirmations - are maintained in a secure electronic format at the principal place of business (and in an alternate secure, physical location) for the appropriate time required by law. This essential client information is stored in a format that is easily retrievable, (e.g., pdf, tif, gif, etc.) and accessible in a timely manner.

## Communication with Clients

Upon the declaration of an emergency, when normal lines of communication are no longer available, Faithward Advisors' personnel will communicate with clients via any means available. Faithward Advisors LLC maintains a list of current clients that includes all known contact numbers (home, work, cell phone, and email addresses). Each advisor will seek to communicate and maintain contact with clients on an as-needed basis.

*Faithward Advisors, LLC is a Registered Investment Advisor. Securities offered through American Portfolios Financial Services, Inc. (Holbrook, New York, 631.439.4600), member FINRA, SIPC. Investment Advisory Services offered through Faithward Advisors, LLC. Faithward Advisors is not owned or operated by American Portfolios Financial Services.*