



## **Privacy Policy Notice**

### **Client Information Privacy Principles**

Like most industries today, the investment management industry is rapidly being shaped by technology, which is literally changing the way we do business. To be successful in this environment, we must continue to ensure that our clients are confident that we will manage their financial affairs expertly and confidentially.

BrightTree Financial (Hereafter "BrightTree Financial" collects personal, private information from its clients in order to determine the client's specific investment goals and objectives, which will assist in determining how to adequately service the client account based on the services provided by BrightTree Financial, as disclosed in BrightTree Financials' Form ADV Part 2A brochure.

The safeguarding of client information is an issue we take seriously, and we want to assure all of our clients that whenever information is collected and used, it is done so with discretion. To affirm our continuing commitment to the proper use of client information, we have set forth the following Privacy Principles, which are designed to guide us in serving the privacy needs of our clients.

### **Recognition of a Client's Expectation of Privacy**

At BrightTree Financial, we believe the confidentiality and protection of client information is one of our fundamental responsibilities. Moreover, while information is critical to providing quality service, we recognize that one of our most important assets is our clients' trust. Thus, the safekeeping of client information is a priority for BrightTree Financial

### **Use, Collection, and Retention of Client Information**

BrightTree Financial limits 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, employment status, annual income, and net worth.

### **Maintenance of Accurate Information**

BrightTree Financial recognizes that it must maintain accurate client records. The above referenced information is collected at the inception of your relationship with BrightTree Financial. Therefore, BrightTree Financial will contact you periodically to review your overall

account holdings, and to ensure that personal/confidential information contained in your file is accurate. BrightTree Financial so request that you review any information provided to you related to your BrightTree Financials' account, and notify BrightTree Financial promptly on the discovery of erroneous information at [Harold.green@brightfg.com](mailto:Harold.green@brightfg.com) to comment or request to correct inaccurate information immediately.

## Limiting Employee Access to Information

BrightTree Financials' employee access to personally identifiable client information is limited to those employees that have a business reason to know such information. Employees are educated on the importance of maintaining the confidentiality of client information and on these Privacy Principles. Because of the importance of these issues, all BrightTree Financial employees are responsible for maintaining the confidentiality of client information and employees who violate these Privacy Principles will be subject to discipline.

## Protection of Information via Established Security Procedures

BrightTree Financial recognizes that a fundamental element of maintaining effective client privacy procedures is to provide reasonable protection against the unauthorized access to client information. Therefore, BrightTree Financial has established appropriate security standards and procedures to guard against any unauthorized access to client information.

## Restrictions on the Disclosure of Client Information

When it comes to sharing client information with unaffiliated companies, BrightTree Financial places strict limits on who receives specific information about client accounts and other personally identifiable data. BrightTree Financial may share information with such companies if they provide a product or service that may benefit our clients. Whenever we do this, we carefully review the company and the product or service to make sure that it provides value to our clients.

We share the minimum amount of information necessary for that company to offer its product or service. 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 (for example, with consumer reporting agencies and government agencies); 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.

1. 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.

2. Disclosure of Privacy Principles to Clients: BrightTree Financial recognizes and respects the privacy expectations of our clients. We want our clients to understand our commitment

to privacy in our use of client information. Because of our commitment, we have developed these Privacy Principles, which are made readily available to our clients. Clients who have questions about these Privacy Principles or have a question about the privacy of their client information should call.

These Privacy Principles apply to individuals, and we reserve the right to change these Privacy Principles, and any of the policies or procedures described above, at any time. Under such circumstances, we will provide you with an updated set of our policies, and will provide adequate time for you to opt out of any information sharing arrangement. These Privacy Principles are for general guidance and do not constitute a contract or create legal rights and do not modify or amend any agreements we have with our clients.

### 3. Electronic Delivery to Clients:

BrightTree Financial recognizes and respects the privacy expectations of our clients. We may deliver copies of this privacy policy using electronic means at least annually or upon request from our clients.

### Updates and Review

- *Updated: 03/03/2022*

### Firm Principal Attestation

- Signed: Harold A. Green, CLU®, CAP®
- Title: Chief Investment Officer, Fiduciary Advisor
- Date: 03/03/2022