

New Focus Financial Group Customer Information Privacy Policy

Like most industries today, the financial services industry is rapidly being shaped by technology, which is changing the way we do business. To be successful in this environment, we must continue to ensure that we will manage our customer's financial affairs pragmatically and confidentially. At New Focus Financial Group our customers have access to a broad range of investments and services. To deliver these products and services as effectively and conveniently as possible, it is essential that we use current technology to manage and maintain certain customer information. We want to assure all our customers that whenever information is used, it is done with discretion, integrity, and conforming to high security standards. The safeguarding of customer information is an issue we take seriously at New Focus Financial Group. To affirm our continuing commitment to the proper use of customer information, we have set forth the following Privacy Policy. It is this Privacy Policy that guides us in serving the privacy needs of our customers.

1. *California Consumer Privacy Act of 2018 ("CCPA")*: The CCPA is a piece of legislation that provides California residents rights over the information collected and retained by business like ours. At New Focus Financial Group we believe the standards established by the CCPA should apply to all our customers, irrespective of where they reside. As outlined below, our clients have the right to know: the type information we collect, right to delete the information we collect – subject to an exception, and right to opt out of Sale of that information.

2. *Recognition of a Customer's Expectation of Privacy*: At New Focus Financial Group we believe the confidentiality and protection of customer information is a fundamental responsibility. While information is critical to providing quality service, we recognize that one of our most important assets is customer trust and confidence. Thus, the safekeeping of customer information is a priority.

3. *Collection and Retention of Customer Information*: New Focus Financial Group limits the use, collection, and retention of customer information which is necessary or useful to effectively conduct business and provide quality service to our clients. Information collected may include but is not limited to: a client(s) name, address, telephone number, tax identification number or social security number, date of birth, employment status, annual income, net worth, financial statements and previous tax filings, estate documents, insurance information, and more.

4. *Maintenance of Accurate Information*: New Focus Financial Group recognizes that it must maintain accurate customer records. Therefore, New Focus Financial Group has established procedures to maintain the accuracy of customer information and to keep such information current and complete. These procedures include responding to requests to correct inaccurate information in a timely manner.

5. Limiting Employee Access to Information: At New Focus Financial Group employee access to personally identifiable customer information is limited to those with a business reason to know such information. Employees are educated on the importance of maintaining the confidentiality of customer information and on the Privacy Policy. Because of the importance of these issues, all New Focus Financial Group employees are responsible for maintaining the confidentiality of customer information and employees who violate the Privacy Policy will be subject to disciplinary measures.

6. Protection of Information via Established Security Procedures: New Focus Financial Group recognizes that a fundamental element of maintaining effective customer privacy procedures is to provide reasonable protection against the unauthorized access to customer information. Therefore, New Focus Financial Group, Inc. has established appropriate security standards and procedures to guard against any unauthorized access to customer information.

7. Restrictions on the Disclosure or Sell of Customer Information: When it comes to sharing or selling customer information with unaffiliated companies, New Focus Financial Group places strict limits on who receives specific information about customer accounts and other personally identifiable data. New Focus Financial Group may share information with unaffiliated companies that in the normal course of our business assist in providing investments and critical services to our customers only. Additionally, only in situations when legally required or permitted in connection with fraud investigations or litigation; in connection with acquisitions and sales; and at the request or with the permission of a customer only.

8. Maintaining Customer Privacy in Business Relationships with Third Parties: If we provide personally identifiable customer 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 and subject to a Non-Disclosure Agreement and/or Confidentiality Clauses.

9. Provision of Opt Out: New Focus Financial Group currently operates under a “do not share” and “do not sell” policy. Therefore, given our strict policy, we do not need to provide the right for its clients to opt out of sharing or selling with nonaffiliated third parties.

10. Disclosure of Privacy Policy to Customers: New Focus Financial Group recognizes and respects the privacy expectations of our customers. We want our customers to understand our commitment to privacy in our use of customer information. As a result of our commitment, we have developed this Privacy Policy which we made readily available to our customers. Customers who have questions about the Privacy Policy, want to request a detailing of the information we maintain on their behalf or have a question about the privacy of their customer information should email us at robblackandyourmoney@gmail.com

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