



Policy on Privacy, Security, and Confidentiality

Your Privacy Is Protected

At First Affirmative, we are committed to maintaining the confidentiality of all financial information specific to clients. We do not share or sell personal information about our clients or prospective clients with unaffiliated third parties. Sometimes, however, we must share personal and financial information for everyday business purposes such as to process transactions or maintain accounts, or as otherwise permitted by law or regulation. The law allows you to “opt out” of certain types of information-sharing with third parties. Our policy automatically opts you out.

Termination of the Investment Advisory Services (IAS) Agreement includes the withdrawal of consent to share information except as relates to information about former clients as outlined below.

Federal securities laws require us to collect and verify personal information directly from you, our client, to include name and address, Social Security number or tax identification number, bank information, date of birth, and other confidential information such as your investment goals, annual income and investable assets that may be pertinent to the development of a financial plan and/or an Investment Policy Statement (IPS). The financial plan and/or (IPS) that is created uses the information you provide about your investment goals, annual income and investable assets making it unique to you and appropriate for your needs and goals.

Other information about clients maintained by First Affirmative includes investment activity, account balances, transaction history, and fees paid. Though many of the above listed information is generated by actions of First Affirmative, such as transactions or fee invoicing, the information is received from our custodians through a secure data link. This information is used to maintain the agreed upon investment strategy from the IPS. Such information is distributed to you in your quarterly performance report. Some of this information also appears on your quarterly Statement of Management Fees. Information about our custodians is contained in our ADV Disclosure Brochure.

The information is used in providing the services current and former clients contract with us to deliver. We share certain personal, confidential information outside the company only as specified below:

- a. Administrative service providers, custodians, and broker-dealers that are executing transactions.
- b. Third-party money managers hired to manage client accounts.
- c. Independent accountants.
- d. Any Federal or State Regulatory Agency, as needed, or as otherwise prescribed by law or court order.

All First Affirmative authorized personnel have signed an employment agreement which includes non-disclosure language. Only those staff members or designated independent contractors that must have access to client information have the means to view such information.

Client privacy is deemed to extend to the household (adults, whether related by marriage or not, residing at the same address). Information about assets not held jointly can only be shared with the non-owning household member after consent of the owner is given. For example, a married couple with a joint account and two individual IRA accounts must each formally consent to First Affirmative sending information or discussing the IRAs with the non-owner party. This consent includes discussion and implementation of management fee calculations and any lower fee rates applicable due to the aggregation of accounts for the purpose of achieving fee schedule breakpoints, periodic performance reports, and other communications.

There are several types of relationships that make up a household covered by this policy. These types include: 1) husband / wife; 2) unmarried cohabitants; 3) blended families; and 4) siblings grouped for breakpoints. Each relationship type must sign an IAS Agreement to open an account with First Affirmative. Privacy issues are discussed in the IAS Agreement and all signatories to the agreement understand that by signing they have granted First Affirmative consent to share private information (as described above) with other members of the household.

Any adult in the household who is unwilling to grant the consent described above must enter into a separate agreement with First Affirmative and, thereby, waive any right to the aggregation of account assets for the purpose of achieving lower fee rate breakpoints. First Affirmative's custodians require information obtained from a government issued photo identification document. As prescribed by law, we perform a search to ensure that client's names do not appear on any "suspicious activity list." We perform this test when new account paperwork is received and quarterly thereafter. We do not use the services of any Credit Reporting Agency.

We employ safeguards to protect our electronic files containing client information from outside access. We will not send client information via e-mail without encryption or security designed to allow no one but the intended recipient to access the information.

First Affirmative devotes significant resources to maintain and regularly upgrade its systems and processes which are designed to protect the security of the Firm's computer systems, software, networks and other technology assets and the confidentiality, integrity and availability of information belonging to the Firm and its clients. Despite these measures, there can be no assurance that all of the Firm's security measures will provide absolute security. The Firm may not always be able to anticipate or to implement effective preventive measures against all security breaches, which may involve sophisticated and targeted attacks intended to obtain confidential information, destroy data, disable, degrade or sabotage systems and services through the introduction of computer viruses, malware, cyber-attacks, or other means. The techniques used in cyber-attacks change and become more sophisticated; frequently they are not recognized until an attack is launched which can originate from a wide variety of sources, including third-parties connected to the Firm's systems.

First Affirmative provides this notification of our Policy on Privacy, Security, and Confidentiality to every prospective client and we send a new copy to every client annually.

The California Consumer Privacy Act of 2018 (the CCPA) provides California residents – as that term is defined in Title 18, Section 17014 of the California Code of Regulations – the right to request that we delete any personal information that we have collected from you. However, please note that, as described above, we are subject to recordkeeping requirements imposed by the Securities and Exchange Commission (SEC) that may preempt this law and prevent us from deleting your information. For example, we cannot delete your information if you are currently a client. We also are subject to a requirement to preserve your information for up to 5 years after you have closed your account.

In order for current clients that are California residents to request deletion of personal information they must send a letter to the address below, or preferably, contact your advisor. They will forward your request to us. If you are a former client, you should send us a letter or email us at service@firstaffirmative.com. We will take steps to verify that the request was initiated by you various means up to and including contacting you by telephone. . A letter or email will be sent to you confirming that your request has been completed or explaining to you why we could not comply with your request.

The CCPA also gives its residents certain other rights, including to request details about what we have collected about you, to direct us not to sell your information and not receive discriminatory treatment from us by exercising your rights under the CCPA. We have already disclosed much of what we collect about you and why in this Privacy Policy. In addition, as noted above, we do not share or sell personal information about our clients with unaffiliated third parties for the purpose of marketing their products and/or services. You should contact your advisor with any questions or call First Affirmative at 719-478-7036.

A request for deletion of personal information made to First Affirmative will not affect the information collected and retained by the custodian(s) on the account. Please see those custodians' respective procedures for submitting such a request.