

## PRIVACY POLICY

We value the trust our clients have placed in us and are committed to the responsible management, use, and protection of their personal information. Please take a moment to review this Privacy Policy to learn how we protect your information and use it to service your account(s).

### **Information We Collect From You**

The privacy policy statement is given to clients at the initial signing of the client contract and mailed or emailed with client consent once annually, if the policy is updated. The CCO will document the date the privacy policy was delivered to each client for each year if an annual delivery is required. GFLLC collects non-public personal information about clients from the following sources:

- Information it receives from them on applications or other forms;
- Information about their transactions with GFLLC or others; and
- Information it receives from a consumer reporting agency.

Below are the reasons for which GFLLC may share a client's personal information:

- With specific third parties as requested by the client (see Sample 11);
- For everyday business purposes – such as to process client transactions, maintain client account(s), respond to court orders and legal investigations, or report to credit bureaus;
- For marketing by GFLLC – to offer GFLLC's products and services to clients;
- For joint marketing with other financial companies;
- For affiliates' everyday business purposes – information about client transactions and experience; or
- For non-affiliates to market to clients (only where allowed).

If a client decides to close his or her account(s) or becomes an inactive customer, GFLLC will adhere to the privacy policies and practices as described in this Policies and Procedures manual, as updated.

GFLLC uses various methods to store and archive client files and other information. Third party services or contractors used have been made aware of the importance GFLLC places on both firm and client information security. GFLLC also restricts access to clients' personal and account information to those employees who need to know that information to provide products or services to its clients. In addition to electronic protection, procedural safeguards, and personnel measures, GFLLC has implemented reasonable physical security measures at its home office location

The names of GFLLC's current and former access persons can be found in Exhibit 2.

In addition to GFLLC's listed access persons, any IT persons or other technical consultants employed at the firm may also have access to non-public client information at any time. An on-site or off-site server that stores client information, third-party software that generates statements or performance reports, or third-party client portals designed to store client files all hold the potential for a breach of non-public client information.

To mitigate a possible breach of the private information, GFLLC uses encryption software on all computers and carefully evaluates any third-party providers, employees, and consultants with regard to their security protocols, privacy policies, and/or security and privacy training.

The system is tested and monitored at least annually.

The test conducted by the CCO will include the following activities:

- Attempt to access a random sample of firm devices to ensure that proper passwords are in place to prevent access;
- Attempt to access users' accounts with the proper password to ensure that two-factor authentication prevents system access; and
- Attempt to restore a sample of files and records to ensure that the restoration process is sufficient and properly configured.

The results from the annual test will be documented and utilized as an opportunity to update the Cyber Security & Information Security Policy.

### **Safeguarding Information**

Guernsey Financial, LLC recognizes the need to prevent unauthorized access to the information we collect, including information held in electronic format. Guernsey Financial, LLC authorizes access to your nonpublic personal information only to personnel who need that information to serve you. We maintain physical, electronic, and procedural safeguards regarding your nonpublic, personal information to ensure that we comply with our own policy, industry practices, and federal and state regulations. If you decide to close your account(s) or become an inactive customer, we will adhere to the privacy policies and practices as described in this notice.

### **Questions**

You do not have to contact us to benefit from our privacy protections; they apply automatically to all our customers and former customers. If you have any questions after reading this privacy policy, we encourage you to contact your advisor or to write to:

Guernsey Financial, LLC  
6704 Plantation Road  
Pensacola, FL 32504  
Attn: Compliance