

# Privacy Policy

## Dougherty & Associates Financial Advisors, Inc.

Dougherty & Associates Financial Advisors, Inc. ("the Firm" or "we") is committed to providing you with the highest level of service and protecting your private information. We know that you expect us to service you in an accurate and efficient manner. To do so, we must collect and maintain certain personal information about you. We want you to know what information we collect and how we use and safeguard that information. We hold all personal client information in the strictest confidence. We want to make sure you know that we have implemented important practices and procedures for safeguarding the privacy and security of your private information. Please read this notice carefully to understand what we do.

This Privacy Policy applies to both current and former clients. If you decide to terminate your relationship with the Firm, we will continue to adhere to our Policy with respect to you as described in this notice.

### What Information We Collect

The information the Firm gathers about you helps us better understand your financial needs and allows us to provide more personalized and effective service to you, and to construct an appropriate asset allocation and investment policy to help you achieve your overall financial goals. We limit the collection and use of client information only to the amount necessarily required in order to service you. The categories of private information that we collect from you will depend on the scope of engagement.

The information the Firm gathers comes from a variety of sources, including information you provide to us about your personal finances (such as on applications or questionnaires about your income, assets or investment goals, or your tax returns), information about transactions between you and third parties (such as a custodian, broker-dealer and/or an insurance company), information we receive from consumer reporting agencies and other companies (such as your credit history), information related to your transactions with us (such as account balances, record of transactions and payment or purchase history), and information we obtain from others at your request (such as your estate plan).

Examples of a client's personal non-public information include, but are not limited to, age, social security number, annual household income and net worth, previous investment experience, existing investment portfolio, current income needs, short-term liquidity needs, long-term investment goals, the allocation of assets in a client portfolio, the composition of investments in any client portfolio, information relating to services performed for or transactions entered into on behalf of clients, advice provided by the company, and data or analyses derived from such non-public personal information.

The Firm maintains client records for as long as the client has a relationship with us, and for as long thereafter as we are required by applicable law or other rules to main such records. After this required period of record retention, all personal non-public information will be destroyed.

### What Information We Disclose

We do not provide your private information to any third parties or external organization unless we have previously informed you about such provision pursuant to disclosures or agreements, have been authorized by you, orally or in writing, to reveal such information (such as to your accountant or attorney), or are authorized and/or required by law to reveal such information.

Federal regulations permit the Firm to share a limited amount of information with custodians, clearing firms, third party money managers, and broker-dealers in order to execute securities transactions on our clients' behalf. In addition, federal and state regulators may review the Firm's records, including

clients' records and personal information, as permitted by law. The Firm may also share your information with our attorneys, accountants and auditors, strictly on a need-to-know basis and for a legitimate business, legal or compliance purposes.

There are certain States which require the Firm to obtain your affirmative consent to authorize sharing of private information. If you live in such a State, we will seek your written authorization to disclose your confidential information before that data is shared.

The Firm does not provide clients' personally identifiable information to mailing lists vendors or solicitors. We have no affiliates to whom we provide clients' personally identifiable information. We do not share information with non-affiliates for marketing purposes. We do not engage in joint marketing with non-affiliates.

### **Security of Your Information**

The Firm maintains a secure office and computer environment to ensure that client information is only made available to authorized company personnel and is not placed at unreasonable risk. We limit employee and agent access only to those who have a business or professional need-to-know. We maintain physical, electronic and procedural safeguards that comply with applicable federal or state standards to protect your nonpublic personal information.

You can help protect your privacy by not sharing your account information or passwords with others. If someone hacks into your e-mail address or you become the victim of fraud or identity theft, please notify the Firm immediately so that we can take appropriate measures to verify your identity for future transactions and issue new access codes if necessary.

### **Changes to Our Privacy Policy**

All new clients are provided with a copy of this Privacy Policy. Our Policy is made available to each current client on an annual basis. Our Policy may change from time to time. We will provide you notice of any material change to this Policy before implementing the change.

### **Questions:**

The Firm welcomes the opportunity to answer any questions you may have about this Policy or the safeguarding and confidentiality of your information. For more information, please contact DILLON L DOUGHERTY, Chief Compliance Officer at 763-682-4014.