Privacy Policy

We are committed to safeguarding the confidential information of our clients and retaining your trust.

This policy describes how we protect your privacy.



Tel: (908) 464-0102

Lassus Wherley Privacy Policy



We are sending you our privacy policy in compliance with federal regulations. Protecting your privacy and maintaining your confidential information in a secure environment is a top priority for us.

Clare E. Wherley

Please take a moment to look it over. We have posted this privacy policy on our website (<u>www.lassuswherley.com</u>) for your convenience. Please contact us with any questions or concerns you may have regarding this policy.



Diahann W. Lassus

Clare and Diahann

Clare E. Wherley, CPA, CFP® Diahann W. Lassus, CFP®, CPA/PFS

DISCLOSURE OF PERSONAL INFORMATION

Lassus Wherley ("LWA") is committed to safeguarding the confidential information of its clients and retaining your trust. We respect your right to keep your personal information confidential and to avoid unwanted solicitations. We hold all personal information that we collect from you in connection with any of the services provided by LWA in the strictest confidence possible. In this respect, LWA maintains physical, electronic, and procedural safeguards that comply with federal and other standards to protect its clients' nonpublic personal information ("Information"). Through this policy and its underlying procedures, LWA attempts to secure the confidentiality of client records and Information and protect against anticipated threats or hazards to the security or integrity of client records and Information.

It is the policy of LWA to restrict access to all current and former clients' Information (i.e., information and records pertaining to personal background, investment objectives, financial situation, tax information/returns, investment holdings, account numbers, account balances, etc.) to those employees and affiliated/nonaffiliated entities who need to know that information in order to provide products or services in furtherance of the client's engagement of LWA. In that regard, LWA may disclose the client's Information: (1) to individuals and/or entities not affiliated with LWA, but only with the clients' implied (as noted below) or confirmed consent. Such individuals or other entities may include, but not be limited to the client's other professional advisors and/or certain service providers that may be recommended or engaged by LWA in furtherance of the client's engagement of LWA (i.e., attorney, accountant, insurance agent, account custodian, record keeper, proxy management service provider, etc.); (2) required to do so by judicial or regulatory process; or (3) otherwise permitted to do so in accordance with the parameters of applicable federal and/or state privacy regulations including: the

Investment Advisers Act of 1940, the Rules promulgated thereunder, and related regulations; the Code of Professional Conduct of the New Jersey and Florida Societies of Certified Public Accountants; Ethics Rulings of the American Institute of Certified Public Accountants (AICPA); and the CFP® Board Standards of Professional Conduct, Code of Ethics, and Rules of Conduct.

The disclosure of Information contained in any document completed by the client for processing and/or transmittal by LWA to facilitate the commencement/continuation/ termination of a business relationship between the client and/or between LWA and a nonaffiliated third-party service provider (i.e., account custodian, record keeper, insurance company, etc.), including, but not limited to Information contained in any document completed and/or executed by the client in furtherance of the client's engagement of LWA (i.e., advisory agreement, client information form, etc.), shall be deemed as having been automatically authorized by the client with respect to the corresponding nonaffiliated third-party service provider.

Employees violating LWA's Privacy Policy will be subject to LWA's disciplinary process. Additionally, whenever LWA hires other organizations to provide services to LWA's clients, LWA will request that they sign confidentiality agreements and/or the Privacy Policy. We do not disclose Information* about our current and former clients to affiliated and nonaffiliated third parties, except as described above.

Although we do not anticipate changing our privacy policy, as stated above, we would be prohibited under the law from doing so without advising our clients first.

SECURITY STANDARDS

LWA continually updates and improves security standards and procedures to guard against anyone gaining unauthorized access to your Information, including through the Internet. We maintain a secure office and computer environment to ensure that your Information is not placed at unreasonable risk. We limit employee access to Information to only those who have a business or professional reason for knowing and only to nonaffiliated parties as permitted and required by law. We regularly train our employees on privacy and information security and on their obligations to protect your Information. Personal Information from any source is destroyed in a manner consistent with commonly-accepted industry practice.

TYPES OF INFORMATION WE COLLECT

The content of nonpublic personal Information that we collect depends upon the scope of the client engagement. It includes Information about you that is provided by you, or obtained by us with your authorization, to prepare your personal income tax returns, provide personal financial planning, manage your assets or provide family office support services to you. Transaction Information would also include your payment history with us, billing records and any collection effort engaged in by us for payment of services rendered to you.

Personally identifiable Information about you will be maintained during the time you are a client and for the required time thereafter that such records are required to be maintained by federal and state laws and consistent with: the Investment Advisers Act of 1940, the Rules promulgated thereunder, and related regulations; the Code of Professional Conduct of the New Jersey and Florida Societies of Certified Public Accountants; Ethics Rulings of the American Institute of Certified Public Accountants (AICPA); and the CFP® Board Standards of Professional Conduct, Code of Ethics, and Rules of Conduct. After this required period of record retention, all such Information will be destroyed.

* Some states may impose additional limitations on sharing nonpublic personal Information. Since we currently do not disclose such Information, these limitations do not apply. Should our policy on disclosing such Information change, we will comply with these additional requirements.

June 2018

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Questions

If you have questions regarding this privacy policy, please call us at (908) 464-0102.



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