

PRIVACY NOTICE

This Privacy Policy Notice covers the practices of Nicolette Financial Advisors LLC, hereafter referred to in this document as Nicolette Financial.

Customer Privacy Policy Notice

Last Updated February 1, 2023

In November of 1999, Congress enacted the Gramm-Leach-Bliley Act (GLBA). The GLBA requires certain financial institutions, such as investment advisor firms, to protect the privacy of customer information. Federal law gives clients the right to limit some but not all sharing of your personal information. In situations where a financial institution does disclose customer information to nonaffiliated third parties, other than permitted or required by law, clients must be given the opportunity to opt out or prevent such disclosure. Nicolette Financial does not share or disclose customer information to nonaffiliated third parties except as permitted or required by law.

Commitment to Your Private Information

Nicolette Financial is committed to safeguarding the confidential information of its clients. Nicolette Financial holds all personal information provided by clients in the strictest confidence and it is the objective of the firm to protect the privacy of all clients. Except as permitted or required by law, Nicolette Financial does not share confidential information about clients with nonaffiliated parties. In the event that there were to be a change in this policy, the firm will provide clients with written notice and clients will be provided an opportunity to direct Nicolette Financial as to whether such disclosure is permissible.

Why We Collect and How We Use Information

To conduct regular business, Nicolette Financial collects personal information from sources such as:

- Information reported by the client on applications or other forms the client provides to us
- Information about the client's transactions implemented by the firm or others
- Information developed as part of financial plans, analyses or investment advisory services

To administer, manage, service, and provide related services for client accounts, it is necessary for Nicolette Financial to provide access to customer information within the firm and to nonaffiliated companies, with whom the firm has entered into agreements with. To provide the utmost service, we disclose the information below regarding clients and former clients, as necessary, to companies to perform certain services on our behalf.

- Information Nicolette Financial receives from the client on applications (name, social security number, address, assets, etc.)
- Information about the client's transactions with the firm or others (account information, payment history, parties to transactions, etc.)
- Information concerning investment advisory account transactions
- Information about a client's financial products and services transaction with Nicolette Financial

Sharing Information with Other Companies Permitted Under Law

Since Nicolette Financial shares nonpublic information solely to service client accounts, the firm does not disclose any nonpublic personal information about the firm's clients or former clients to anyone, except as permitted by law. However, the firm may also provide customer information outside of the firm as required by law, such as to government entities, consumer reporting agencies or other third parties in response to subpoenas. Additionally, Nicolette Financial does not jointly market with affiliated or nonaffiliated companies.

In the event that Nicolette Financial has a change to its customer privacy policy that would allow it to disclose nonpublic information not covered under applicable law, we will allow clients the opportunity to opt out of such disclosure.

How We Protect Your Information

Nicolette Financial maintain a comprehensive information security program designed to ensure the security and confidentiality of customer information, protect against threats or hazards to the security of such information and prevent unauthorized access. This program includes:

- Procedures and specifications for administrative, technical and physical safeguards
- Security procedures related to the processing, storage, retention and disposal of confidential information
- Programs to detect, prevent and, when necessary, respond to attacks, intrusions or unauthorized access to confidential information
- Restricting access of customer information to employees who need to know that information to provide products and services to you, and appointing specific employees to oversee our information security program

Former Customers

Even if we cease to provide you with financial products or services, our Privacy Policy will continue to apply to you and we will continue to treat your nonpublic information with strict confidentiality.

Changes to this Policy

Nicolette Financial will provide each client with initial notice of the current Privacy Policy when the client relationship is established. Additionally, Nicolette Financial may occasionally amend this Privacy Policy at any time. If we decide to use personal information in a manner that is materially different from that stated at the time it was collected, we will notify you of such changes prior to implementing them by posting a revised Privacy Policy with a new "Effective Date". Nicolette Financial shall also provide each client with the current Privacy Policies at least annually.

We encourage you to check our website frequently to see when this Privacy Policy was last revised and to be informed of how we are committed to protecting your information.

Other Ways to Protect Your Privacy

There are several things you can do to protect yourself and your family from identity theft and related crimes. Helpful tips can be found on the Federal Trade Commission's Identity Theft website at <https://www.ftc.gov/faq/consumer-protection/report-identity-theft/> or by calling 1-877-IDTHEFT. This website also provides you with important information on what you should do if you believe you are a victim of identity theft.

This Notice does not expand legal obligations.

This Notice is not intended to create any liability other than that already found in law.

This Policy is effective as of February 1, 2023.