

VARI INVESTOR SERVICES, INC.

PRIVACY STATEMENT

Vari Investor Services, Inc. is an independent financial planning firm and is committed to keeping the confidential information provided to our firm in the strictest confidence. These records include all personal information that we collect from you in connection with any of the services we provide. We do not disclose information to unaffiliated third parties, except as permitted/required by law, and do not anticipate doing so without advising you first. We use health and financial information that you provide to us to help you meet your personal financial goals while guarding against any real or perceived infringements of your rights of privacy. Our policy with respect to personal information about you is listed below.

- We limit employee access to information only to those who have a business or professional reason for using it, and only to unaffiliated parties as permitted/required by law. (For example, federal regulations permit us to share a limited amount of information about you with a brokerage firm in order to execute securities transactions on your behalf, or so that our firm can discuss your financial situation with your accountant or attorney.) All employees are required to sign a confidentiality agreement whereby they agree not to disclose any information about our clients during or after their employment with our firm.
- We maintain a secure office and computer environment to ensure that your information is not placed at unreasonable risk. We have installed several cybersecurity programs which monitor on a continuous basis all activity on each of our computers, including continuous backup of data and continual detection of internet activity.
- The categories of nonpublic personal information that we collect from a client depend upon the scope of the client engagement. These could include but may not be limited to information about your health, information about transactions between you and third parties, tax returns, insurance policies, asset statements, trusts, wills and employee benefit programs.
- We will not disclose information about you to unaffiliated third parties except as required under our contract with you or by law. Our only major unaffiliated third party is Charles Schwab & Co. They already possess some of your personal information because this information is contained on your account applications. We do not disclose any additional information about you to Charles Schwab & Co. By law, certain federal regulatory authorities (primarily the Securities & Exchange Commission) have access to some of your personal information if and when they perform audits on our firm.
- We do not provide any information about you to mailing list vendors or solicitors for any purpose.
- Your personal information 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 securities laws, and consistent with the CFP Board Code of Ethics and Professional Responsibility. After this required period of record retention, all such information will be destroyed.

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January 15, 2019