



# ***SOMMERS FINANCIAL MANAGEMENT***

**144 S. 14<sup>th</sup> Street – P.O. Box 1552 - Saint Helens, Oregon 97051  
(503) 397-1545 - [www.sommersfinancial.com](http://www.sommersfinancial.com)**

## **PRIVACY POLICY**

**Sommers Financial Management has always considered the protection of sensitive information to be a sound business practice and a foundation of customer trust. We make your privacy one of our leading priorities.**

We collect personal information to open your account(s), to process your transactions and to help us provide a better level of service. We hold in the strictest confidence all the personal information you give us. We do not sell, rent or trade any client information to anyone. We protect the security and confidentiality of the personal information we collect.

Our relationship with you is our most important asset. We understand that you have entrusted us with your private financial information, and we do everything we can to maintain that trust.

**We do not sell your personal or account information to anyone; such information can be separated into the following categories:**

**Personal Information** – This information may include, among other things, your name, address, phone number, date of birth, social security number, marital status, spousal information if married, your occupation and employer, monthly income and expenses, assets, your tax bracket, name, address, birth date and social security number of your beneficiaries, personal financial information that you provide to us on new account applications or other forms, or any additional information that you wish to share with your account representative.

**Information Regarding Your Account History** – As part of establishing a business relationship with you, we collect and maintain information regarding your investment transactions and other activities that occur here at SFM. This includes items such as your account balance, payments, withdrawals, contributions, account activity, and correspondence with you.

**Trust and Estate Information** – If you make use of our financial planning and estate planning services, personal and financial documents such as trust agreements, wills, and tax records may be collected.

**We do not disclose personal information to third parties for marketing purposes and would disclose such only via the following limited exceptions:**

We disclose personal information to companies that facilitate our business relationship with you (i.e. brokerage firms that we implement trades on your behalf or mortgage brokerages for purposes of loan locks) or as request by you (i.e. your CPA or tax attorney).

Certain federal and state laws may require us to share information about you with courts, regulatory bodies and other governmental agencies. For example, if you are involved in a legal matter with a third party, we may be ordered to provide information to a court or other party. In these circumstances, only



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the specific information required by law, subpoena, or court order will be shared. If permissible, we may notify you as a courtesy.

## **How Does Sommers Financial Management Protect the Confidentiality of Your Personal Information?**

The sharing of information with these entities is essential for us to fully service our clients and to satisfy our legal and regulatory obligations. All of these entities have legal or other obligations with respect to the use and disclosure of your information. In addition, some of these entities may have and provide you their own privacy policies. If our policy on disclosing information ever changes, we will promptly notify you in writing.

We restrict access to nonpublic personal information about you to those employees at SFM on a need to know basis for that information. Our employees are bound by a code of ethics requiring confidential treatment of customer information and are subject to disciplinary action if they fail to follow this code.

We employ extensive information protection controls in keeping with industry standards and practices, and we regularly adapt these physical, electronic, and procedural controls to respond to changing requirements and new technology. Papers or documents that contain your personal information are maintained in our secure office. Our computer systems are designed to ensure that your information is not placed at risk. For example, we limit computer and file access to select associates of the firm and deny access to unauthorized personnel. Before we discard any papers or documents that contain personal information about you, we first shred that material through a secure destruction operation.

## **We continue to evaluate our efforts to protect personal information and make every effort to keep your personal information accurate and up to date.**

If you identify any inaccuracy in your personal information, or you need to make a change to that information, please contact us so that we may promptly update our records.

## **We will provide notice of changes in our information-sharing practices.**

If at any time in the future it is necessary to disclose any of your personal information in a way that is inconsistent with this policy, we will give you advance notice of the proposed change so that you will have the opportunity to opt out of such disclosure.

If you have any questions or concerns, please contact us by email at [info@sommersfinancial.com](mailto:info@sommersfinancial.com) or call us at (503) 397-1545.