

## **Privacy Policy**

Cahill Financial Advisors, Inc. has adopted procedures to implement a policy which covers all employees and contracted professionals (collectively known as "associated persons"), and conducts reviews to monitor and ensure the firm's policy is observed, implemented, and amended as appropriate.

**Type of Information Collected:** Cahill Financial Advisors, Inc. retains nonpublic personal information (NPI) about you from the following sources:

- Information you provide to us in paper or digital formats (via email or uploaded to your client portal)
- Information we generate (such as financial reports)
- Information collected from necessary third parties (such as your account custodians)

**Non-Disclosure of Client Information:** Cahill Financial Advisors, Inc. maintains safeguards to comply with federal and state standards to guard NPI. Associated persons are prohibited, either during or after termination of their association, from disclosing NPI to any and all non-associated persons or entities. Cahill Financial Advisors, Inc. does not share NPI with any non-affiliated third parties, except in the following circumstances:

- As necessary to provide the service that the client has requested or authorized, or to maintain and service the client's account;
- As required by regulatory authorities or law enforcement officials who have jurisdiction over Cahill Financial Advisors, Inc., or as otherwise required by any applicable law; and
- To the extent reasonably necessary to prevent fraud and unauthorized transactions.

Cahill Financial Advisors, Inc. requires that third-party vendors are safeguarding all NPI that is collected from us during the course of business, and we review their policies at least annually.

**Safeguarding and Disposal of Client Information:** Where possible, Cahill Financial Advisors, Inc. restricts internal access to NPI to only those associated persons who need to know such information to provide services to clients. Any associated person who is authorized to have access to NPI is required to keep it secure from unauthorized persons by upholding the following:

- Two-step physical access restrictions are in place at all workstations;
- No electronic client information shall be stored outside of our encrypted server or approved third-party service providers;
- Dual-factor authentication to enter our encrypted server or to gain access to email shall be used, and the security apps and passwords shall be updated periodically;
- Immediate response shall be taken via our Cybersecurity and Incidence Prevention and Response Plan when an access person suspects or detects that unauthorized individuals have gained access to NPI;
- Back-up and off-site storage of key data to ensure proper hazard recovery, as per our Disaster Recovery Plan;
- All NPI that is in paper form shall be locked up when unattended, and shredded when disposed of;
- No NPI shall be left unattended at any time while being carried away from the office;
- All conversations that involve NPI shall be conducted only in the company of those authorized to access the NPI;
- Other policies and procedures not listed, or briefly summarized, in this document are reviewed at least annually by all access persons, and our Code of Ethics is attested to at least annually by all access persons.

**Limitations and Questions:** The custodians who maintain your financial accounts have separate privacy policies. Please review all privacy policies for a complete understanding of how your personal financial information is being treated. If you have any questions about our policy, please call Crystal Nye at 952-926-1659.