

# BD Financial Services Group– Privacy Policy

## Privacy Policy

Protecting the privacy of Clients is a high priority for FINRIA Group LLC (DBA BD Financial Services Group) (the "Company"). This privacy policy sets out general guidelines directing the Company's use of information and outlines the policies and procedures concerning information gathering and dissemination practices of obtained information.

## Client Information

A list of Clients, their contact, information, and other materials uploaded and prepared by the Company for the Client is maintained by the Company for the purposes of performing the work assigned by the Company and communication with Client, including usage issues, updates, newsletters, publications, emails, marketing of additional Company produced applications, industry-related materials, and any other purpose for which the Company desires or deems to be in its best interest of the Company and/or Client. The Company may share such information with other companies, entities, agencies, third party administrators, and specialists that the Company deems useful and beneficial in completing its work, provided, however, no such information shall be shared where the Company believes, in its sole discretion, that such shall be deemed harmful to the Client.

## Updating Client Information

Clients of the Company can update and/or change all personal and/or business information provided to the Company. To do so, users can login to their account and submit their changes.

## Client Information

Client information is only available to officers, directors, employees and agents of the Company and shall only be shared with affiliates and/or contracted third parties for the purposes of completing the assigned work and assure functionality of the Company's proprietary online-based software applications. The Company shall maintain the confidential nature of any account information; no account information shall be used for any purpose other than for which it was provided, no information shall be redistributed, no information shall be left in a public place, and all sensitive customer and/or firm information shall be destroyed five years after the Company and Client have ceased conducting joint business, or upon written request from a Client. The Company's Client information is not made available to the public.

## Disclosure of Client Information

Other than the situations previously noted, third parties wishing to distribute information to Clients must apply to the Company for authorization, which in most cases will be denied. The Company may disclose personal information collected about Clients if, in the Company's sole discretion it is reasonable to do so, including, but not limited to: to satisfy laws, regulations, or governmental or legal requests for such information; to disclose information that is necessary to identify, contact or bring legal action against someone who may be violating our user policies or terms of contracts and/or engagement letters; parties tasked with assuring the site and/or Company applications perform properly; for other commercial purposes related to the work being performed by the Company, whether presently existing, under development or to be developed to market the Company's products made for use for the Client's industry; or to protect the Company's interests, officers, employees and/or agents.

## Banking Information

The Company requires Client's to pay for the reports using standard professional business protocol; fifty percent (50%) retainer prior to commencement of work with the final fifty percent (50%) due prior to download of the completed report(s). If for any reason a report is required to be modified, the Company will use its best efforts to quickly make modification and return the revised report as quickly as possible. Costs for the modification shall be based upon the terms set forth in the engagement letter. If a Client is required to pay additional monies for modifications due to Client error, as set forth in the engagement letter between the Client and the Company, the Company may require the Client to make payment prior to release of the revised report. All banking or other payment method information (the "Payment Method") gathered from Clients shall NOT be retained by the Company. The Company currently uses Authorize.net to accept e-check only (no credit or debit cards are accepted at this time, but may be added in the future). The Client will be required to provide their banking information to Authorize.net, either through an invoice provided to the Client directly via the Authorize.net website application, or via the Authorize.net portal installed on the Company site. In some instances, the Company may use the Authorize.net virtual terminal to manually input the Client banking information; no Client banking information shall be retained by the Company. The Company may change its banking and collection relationships at any time and in its sole discretion, however, and this Privacy Policy will be amended to reflect the changes. The Company does not maintain Client payment information in any of its databases for any purposes; there will never be automatic or recurring charges associated with the use of Company services and the Company shall never charge the Client with express authorization. The Company's current payment processing system is Authorize.net and their Privacy Policy is available via the following link: <https://www.authorize.net/company/privacy/>.

## Website Policy - Security

The Company has obtained an SSL certificate from GoDaddy, which may be changed at the Company's discretion. An SSL certificate is a digital certificate that authenticates the identity of a website and encrypts information sent to the server using SSL (Secure Sockets Layer) technology. Encryption is the process of scrambling data into an undecipherable format that can only be returned to a readable format with the proper decryption key. GoDaddy boasts a 2048-bit Sha256 encryption system. We cannot guarantee, however, that such security measures will prevent third-party "hackers" from illegally obtaining your information, however, the Company will not maintain or store any of your private banking information. Your company data may also be maintained on additional servers for redundancy, business continuity and Company use, in which case data may be stored on Microsoft OneDrive and/or temporarily on the local drive of officers, employees, contractors and agents of the Company. OneDrive saves multiple copies of each file on different drives and servers for business continuity and protection. Only Company officers, employees, contractors and agents will have access to the Company's OneDrive location.

## Website Policy - Cookies

A "cookie" is a small data file that can be placed on your hard drive when you visit certain Web sites. The Company may use cookies to collect, store, and to save your settings and to provide customizable and personalized services. These cookies do not enable third parties to access any of your personal information. Additionally, be aware that if you visit non-Company websites where you are prompted to login or that are customizable, you may be required to accept cookies. Third parties and other non-Company websites may also use their own cookies. We do not control use of these cookies and expressly disclaim responsibility for information collected through them.

## Website Policy - Links to Other Sites

The Company may contain links to other sites. The Company is not responsible for the privacy practices or content of other websites. We encourage you to read the privacy policy statements of each website that collects your personally identifiable information.

## Changes to the Privacy Policy

The Company reserves the right to revise, amend, or modify this Privacy Policy and our other policies and agreements at any time and in any manner. Notice of any revision, amendment, or modification will be posted to our website and/or made known to Clients via updates to websites, applications, or other methods such as email.

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