

## NEXBANK WEALTH ADVISORS

### PRIVACY POLICY

#### **General**

As part of the firm's annual requirement, NexBank Wealth Management ("the Company" or "NexBank") is mailing its privacy policy to each of its individual clients. NexBank has adopted certain procedures designed to maintain and secure the non-public personal information of its clients from inappropriate disclosure to third parties. The policy is designed to meet the standards set forth in the federal regulations.

We are committed to keeping personal information collected from potential, current and former clients confidential and secure. The proper handling of personal information is one of our highest priorities. The Company never sells information relating to its clients to any outside third parties.

The Privacy Policy will be provided to customers initially upon establishing an account and annually or upon request.

#### **Nonpublic Information**

We collect and keep only information that is necessary for us to provide the services requested by our clients and to administer clients' business with the Company.

We may collect non-public personal information from clients or potential clients:

- From clients when they complete an application or other form, as well as through written and electronic correspondence and telephone contacts. This includes information such as name, address, social security number, assets, income, net worth, copies of financial documents and other information deemed necessary to evaluate the Client's financial needs.
- As a result of transactions with the Company, its affiliates or others. This could include transactions completed with the Company or information received from outside vendors to complete transactions or to effect financial goals.

#### **Sharing Nonpublic Information**

In the normal course of business, the Company may share the non-public personal information of its clients with non-affiliated companies or individuals (i) as permitted by law and as required to provide services to our clients, such as with representatives within the Company, administrators, securities clearing firms, mutual fund companies, insurance companies and other financial services providers, or (ii) to comply with legal or regulatory requirements. The Company may also disclose non-public personal information to another financial services provider in connection with the transfer of an account to such financial services provider. Further, in the normal course of our business, the Company may disclose information it collects about clients to companies or individuals that contract with the Company to perform servicing functions such as:

- Record keeping
- Computer-related services

Good faith disclosure to regulators who have regulatory authority over the Company.

Companies hired to provide support services are not allowed to use personal information for their own purposes and are contractually obligated to maintain strict confidentiality. The Company limits use of personal information to the performance of the specific service requested.

We do not provide personally identifiable information to mailing list vendors or solicitors for any purpose. When we provide personal information to service providers, we require these providers to agree to safeguard such information, to use the information only for the intended purpose and to abide by applicable law.

### **Internet Access**

The Company maintains a corporate website. Any information gathered through the Company's website will be treated in accordance with this Privacy Policy.

### **Employee Access to Information**

Only employees with a valid business reason have access to clients' personal information. These employees are educated on the importance of maintaining the confidentiality and security of this information. They are required to abide by our information handling practices.

### **Protection of Information**

We maintain security standards to protect clients' information, whether written, spoken, or electronic. The Company updates and checks its systems to ensure the protection and integrity of information.

### **Maintaining Accurate Information**

Our goal is to maintain accurate, up to date Client records in accordance with industry standards. We have procedures in place to keep information current and complete, including timely correction of inaccurate information.

### **Electronic Communication**

Should clients send us questions and comments via e-mail, we will share the Client's correspondence only with those employees or agents most capable of addressing the Client's questions and concerns.

We will retain all written communication until we have done our very best to provide the Client with a complete and satisfactory response. Ultimately, we will either discard the communication or archive it according to the requirements under applicable securities laws.

Please note that, unless expressly advised otherwise, our e-mail facilities do not provide a means for completely secure and private communications between us and our

clients. Although every attempt will be made to keep Client information confidential, from a technical standpoint, there is still a risk. If the Client wishes, communications with us may be conducted via telephone or by facsimile. Additional security is available to clients if they equip their Internet browser with 128-bit “secure socket layer” encryption, which provides more secure transmissions.

**Disclosure of our Privacy Policy**

We recognize and respect the privacy concerns of our potential, current and former clients. We are committed to safeguarding this information. As a member of the financial services industry, we are providing this Privacy Policy for informational purposes to clients and employees and will distribute and update it as required by law. It is also available upon request.

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**Annual Offering of the Form ADV Part 2**

As part of the firm’s annual requirement, NexBank is making an offering of its Form ADV Part 2 to all Clients. Clients can request a copy of the firm’s Form ADV Part 2A at no charge by calling 972-419-2500.