MOMENTUM ADVANCED PLANNING

MOMENTUM ADVANCED PLANNING
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Confidentiality Policy

Regarding the Collection of Personal & Business Information

Momentum Advanced Planning, LLC, including our affiliates, is committed to maintaining the confidentiality, integrity, and security of the personal information that you provide us. The purpose of this Confidentiality Policy is to provide you with a better understanding of our policies with respect to the collection and use of your personal and business information that you may provide us with in connection with our review analysis of your personal and business matters.

How We Obtain Your Personal Information

Momentum may collect public and non-public personal information about you from any of the following sources:

- You or your representative on applications or forms, (for example, name, address, Social Security number, birth date, assets and income)
- You, your employer or plan sponsor, if Momentum provides them with recordkeeping services (for example, payroll, human resources, or benefits information)
- Transactional activity from your financial advisors (for example, trading history and balances)
- Other interactions with Momentum (for example, discussions with our customer service staff or information you enter into our websites)
- Information from other third-party data services (for example, to verify your identity and to better understand your product and service needs)
- Other sources with your consent or with the consent of your representative (for example, from other institutions if you transfer positions into Momentum)
- Information you upload to third party service providers such as Box, Inc., where you provide us with access to such information

How We Protect Information About You

Momentum considers the protection of personal information to be a foundation of customer trust and a sound business practice. We employ physical, electronic and procedural controls and we regularly adapt these controls to respond to changing requirements and advances in technology. At Momentum, we restrict access to personal information to those who require it to develop, support, offer and deliver products and services to you. Except as provided below, Momentum will not share or divulge your personal information with third parties.

How We Share Information About You with Third Parties

We may share personal information with the following entities:

- Unaffiliated service providers (for example, legal and tax advisory firms, securities clearinghouses, actuarial service providers, and other entities who may provide services at Momentum's direction)
- Government agencies, other regulatory bodies and law enforcement officials when legally required (for example, for tax purposes or for reporting suspicious transactions)
- Other organizations, with your consent or as directed by your representative (for example, if you use Momentum as a financial reference in applying for credit with another institution), or as permitted or required by law (for example, for fraud prevention)

Our service providers are obligated to keep the personal information we share with them confidential and use it only to provide services specified by Momentum. Based on the nature of your relationship with Momentum, we may exchange information with other third parties as described below:

- If Momentum provides workplace services to your employer or plan sponsor, such as payroll, human resources or benefits recordkeeping services, Momentum may exchange any information received in connection with such services with your employer or plan sponsor or others they may authorize.
- If you conduct business with Momentum through your investment professional, we may exchange information we collect with your investment professional or with others they may authorize.
- If you transact business with Momentum through a life insurance agency, we may validate and obtain information about you from an insurance support organization. The insurance support organization may further share your information with other insurers, as permitted by law.

How We Share Information About You Within Momentum

We may share personal information about you with various Momentum corporate affiliates including internal service providers, which perform, for example, legal and tax diagnostics, actuarial and corporate underwriting, and other consulting services. Additionally, if you interact with Momentum directly as an individual client (including joint account holders) or if Momentum provides services to your employer or plan sponsor, we may exchange certain information about you with Momentum affiliates providing the services referenced above.

Privacy Online

We collect certain information through our website and third party service providers such as Box, Inc. The collection of information on our website is further subject to our online privacy policies which are available on our website. The collection and storage of information from third party service providers such as Box, Inc. is also subject to their online privacy policies which are available on their website. Box, Inc. utilizes SSL and 256-bit AES encryption, which are frequently rotated. They are also SSAE16 Type II report certified, and their data centers employ biometric entry and 24/7-armed security.

For data and information related to insurance cases, Momentum may retain the data and information you provide for the minimum duration as legally required by government agencies, other regulatory bodies, and law enforcement officials. We may retain insurance-specific data and information for the duration as described below:

- For in-force insurance policies, records may be retained as long as the policies are in-force;
- For surrendered or canceled insurance policies, records may be retained for three (3) months after the surrender or cancelation dates;
- For insurance applications completed but not processed, records may be retained for six (6) months after original application date, or with thirty (30) days written notice.

Contact Us

Should you have any questions, we would be happy to address them. You can contact us at (312) 216-1873 or www.momentumap.com.