PAVLOV

How we use and secure the data you provide

Overview

Pavlov Financial Planning (“PFP”) recognizes that our relationships with current and prospective clients are based on integrity and trust. We work hard to maintain your privacy and to preserve the private nature of our relationship with you. We place the highest value on the information you share with us. PFP will not disclose your personal information to anyone unless it is required by law or at your direction. We will not sell your personal information.

We want our clients to understand what information we collect, how we use it, and how we protect your personal information.

Why We Collect Your Information

We gather information about you so that we can:

- Help design and implement the investment and financial planning related services we provide you; and
- Comply with the Federal and State laws and regulations that govern us.

What Information We Collect and Maintain

We may collect the following types of “nonpublic personal information” (“NPI”) about you:

- Information from our initial meeting or subsequent consultations about your identity, such as your name, address, phone numbers, social security number, date of birth, marital status, employer, and financial information (e.g. income, expenses, assets, liabilities, investments, tax returns, insurance contracts, social security statement)
- Information that we generate to service your financial needs; and
- Information that we may receive from third parties in connection with the services we provide you.

What Information We Disclose

We are permitted by law to disclose nonpublic information about you to unaffiliated third parties in certain circumstances. PFP may disclose client's NPI: (1) to individuals and/or entities not affiliated with PFP, including, but not limited to third-parties that assist in the supervision or management of your account(s) (i.e., sub-advisers, account custodian, record keeper, attorney, etc.); (2) to service providers contracted by us in order for us to perform the duties in furtherance of the client's engagement with PFP (i.e. client management systems, archiving technology vendors, cloud service providers, etc.); (3) to your authorized representative or power of attorney; (4) when we receive your prior consent; (5) in connection with a proposed or actual sale, merger, or transfer of all or a portion of our business; and (6) as otherwise permitted to do so in accordance with the parameters of applicable federal and/or state privacy regulations.

In the event that PFP has a change to its client privacy policy that would allow it to disclose non-public information not covered under applicable law, PFP will allow its clients the opportunity to opt-out of such disclosure.

How We Protect Your Personal Information

Privacy has always been important to PFP. We restrict and limit access to client information only to those who need to carry out their business functions. We safeguard client information by preventing its unauthorized access, disclosure, or use. We maintain physical, electronic, and procedural safeguards to protect your confidential personal information. Arrangements with companies or independent contractors not affiliated with PFP will be subject to confidentiality agreements.

Former Clients

Even if we cease to provide you with financial services, our Privacy Policy will continue to apply to you, and we will continue to treat your nonpublic information with strict confidentiality. We maintain all records regarding all former clients for the retention period required by law.

Special GDPR Notice

1. For those who are residents of the EU, you have the right to request a copy of all the data that you have supplied to us. We do not otherwise receive data about you from other third party.

2. Under GDPR, you have the right to request that we delete any data we have about you. However, to meet the US regulations, we are required to keep any communications we have with you for at least six years starting on the date you cease to become a client. (Please see the regulations here: https://www.finra.org/rules-guidance/key-topics/books-records)

Contact Us

To discuss any questions regarding PFP's privacy policies and procedures, or to obtain a detailed copy of our Privacy Policy, please contact Sefa Mawuli, Chief Compliance Officer at 703.531.8758 or sefa@pavlovfp.com.