

# Franklin, Turner & Welch LLC

## Privacy Statement

Updated October 2007

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### **Our Commitment to Privacy**

Franklin, Turner & Welch LLC, an independent financial planning firm, is committed to safeguarding the confidential information of our current and prospective clients. All personal information provided is held in the strictest confidence. These records include all personal information that is collected from you in connection with any services provided by Franklin, Turner & Welch LLC. Personal information is not disclosed to nonaffiliated third parties, except as permitted by law. While guarding against any real or perceived infringements of your rights of privacy, any health and financial information that you provide is used to help us make recommendations for your personal financial plan.

### **Franklin, Turner and Welch LLC Privacy Policy**

Franklin, Turner and Welch LLC takes great care to protect your personal information. When we use your personal information, we do so with respect for your privacy. We may use your personal information to service and maintain your account, process transactions in your account, respond to inquiries from you or your representative, or fulfill legal and regulatory requirements.

- Access to information is limited to those who have a business or professional reason for knowing, and only to nonaffiliated parties as permitted by law. (For example, federal regulations permit sharing a limited amount of information about you with a brokerage firm or mutual fund company in order to execute securities transactions on your behalf, or so that your financial situation can be discussed with your accountant or lawyer. Personal information necessary to prepare your income tax return is shared with the Internal Revenue Service, state taxing authorities and tax return processors.)
- A secure office and computer environment is maintained to ensure that your information is not placed at unreasonable risk. We employ physical, electronic and procedural controls and we regularly adapt these controls to respond to changing requirements and advances in technology.
- The categories of nonpublic personal information that are collected from a client depend upon the scope of the client engagement. It could include information about personal finances, information about health to the extent that it is needed for the planning process, information about transactions with third parties and information from consumer reporting agencies.
- For unaffiliated third parties that require access to your personal information, including financial service companies, consultants and auditors, strict confidentiality agreements with them are required and it is expected that they will keep this information private. Federal and state regulators also may review firm records as permitted under law.
- Personally identifiable information is not provided to mailing list vendors or solicitors for any purpose.
- Personally identifiable information about you will be maintained during the time you are a client, and for the time thereafter that such records are required to be maintained by federal and state securities laws, and consistent with the CFP Board Code of Ethics and Professional Responsibility. After this required period of record retention, all such information will be destroyed.

Franklin, Turner and Welch LLC is not in the practice of selling or distributing nonpublic information to third parties. If, in the future, our business directs us to do this, you will be notified and given the opportunity to opt out of having this information shared.