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# ROYAL AMERICAN FINANCIAL ADVISORS, LLC

## 2011 Privacy Statement

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Royal American Financial Advisors, LLC is a state of California Licensed Investment Advisory Company committed to safeguarding the confidential information of its clients. We hold all personal information provided to our company in the strictest confidence. These records include all personal information that we collect from you in connection with any of the services provided by Royal American Financial Advisors, LLC or affiliated companies including Royal American Insurance Services, LLC. We have never disclosed information to nonaffiliated third parties, except as permitted by law, and do not anticipate doing so in the future. If we were to anticipate such a change in company policy, we would be prohibited under the law from doing so without advising you first. As you know, we use financial and health information that you provide to us to help you meet your personal financial goals while guarding against any real or perceived infringements of your rights of privacy. Our policy with respect to personal information about you is listed below.

- We limit employees and agent access to information only to those who have a business or professional reason for knowing, and only to nonaffiliated parties as permitted by law. (For example: Federal regulation permit us to share a limited amount of information with a brokerage firm in order to execute securities transactions on your behalf, or so that we can discuss your financial situation with your accountant or attorney.)
- We maintain a secure office and computer environment to ensure that your information is not placed at unreasonable risk.
- The categories of nonpublic personal information that we collect from a client depend upon the scope of the client relationship or services requested by the client. It will include information about your personal finances, information about your health to the extent that it is needed for the planning/advisory process, information about transactions between you and third parties, and information from consumer reporting agencies.
- For unaffiliated third parties that require access to your personal information, including financial services companies, consultants, and auditors, we also require strict confidentiality in our agreements with them and expect them to keep this information private. Federal and State regulators also may review company records as permitted under law.
- We do not provide your personally identifiable information to mailing list vendors for any purpose.

Personally identifiable information about you will be maintained during the time you are a client, and for the required 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.



## Royal American Financial Advisors, LLC Customer Information Privacy Principles

Like most industries today, the financial services industry is rapidly being shaped by technology, which is literally changing the way we do business. To be successful in this environment, we must continue to insure that our customers are confident that we will manage their financial affairs expertly and confidentially.

At Royal American Financial Advisors, our customers have access to a broad range of products and services from basic banking products to investments, mortgages, insurance, and online banking. To deliver these products and services as effectively and conveniently as possible, it is essential that we use technology to manage and maintain certain customer information.

We want to assure all of our customers that whenever information is used, it is done with discretion. The safeguarding of customer information is an issue we take seriously at Royal American Financial Advisors. To affirm our continuing commitment to the proper use of customer information, we have set forth the following Privacy Principles. It is these Privacy Principles that guide us in serving the privacy needs of our customers.

- 1. Recognition of a Customer's Expectation of Privacy:** At Royal American Financial Advisors, we believe the confidentiality and protection of customer information is one of our fundamental responsibilities. And while information is critical to providing quality service, we recognize that one of our most important assets is our customers' trust. Thus, the safekeeping of customer information is a priority for Royal American Financial Advisors.
- 2. Use, Collection, and Retention of Customer Information:** Royal American Financial Advisors limits the use, collection, and retention of customer information to what we believe is necessary or useful to conduct our business, provide quality service, and offer products, services, and other opportunities that may be of interest to our customers.
- 3. Maintenance of Accurate Information:** Royal American Financial Advisors recognizes that it must maintain accurate customer records. Therefore, Royal American Financial Advisors has established procedures to maintain the accuracy of customer information and to keep such information current and complete. These procedures include responding to requests to correct inaccurate information in a timely manner.
- 4. Limiting Employee Access to Information:** At Royal American Financial Advisors, employee access to personally identifiable customer information is limited to those with a business reason to know such information. Employees are educated on the importance of maintaining the confidentiality of customer information and on these Privacy Principles. Because of the importance of these issues, all Royal American Financial Advisors employees are responsible for maintaining the confidentiality of customer information and employees who violate these Privacy Principles will be subject to disciplinary measures.

5. **Protection of Information via Established Security Procedures:** Royal American Financial Advisors recognizes that a fundamental element of maintaining effective customer privacy procedures is to provide reasonable protection against the unauthorized access to customer information. Therefore, Royal American Financial Advisors has established appropriate security standards and procedures to guard against any unauthorized access to customer information.
6. **Restrictions on the Disclosure of Customer Information:** When it comes to sharing customer information with unaffiliated companies, Royal American Financial Advisors places strict limits on who receives specific information about customer accounts and other personally identifiable data. Royal American Financial Advisors may share information with such companies if they provide a product or service that may benefit our customers. Whenever we do this, we carefully review the company and the product or service to make sure that it provides value to our customers.

We share the minimum amount of information necessary for that company to offer its product or service. We may also share information with unaffiliated companies that assist us in providing our products and services to our customers; in the normal course of our business (for example, with consumer reporting agencies and government agencies); when legally required or permitted in connection with fraud investigations and litigation; in connection with acquisitions and sales; and at the request or with the permission of a customer.

7. **Maintaining Customer Privacy in Business Relationships with Third Parties:** If we provide personally identifiable customer information to a third party with which we have a business relationship, we will insist that the third party keep such information confidential, consistent with the conduct of our business relationship.
8. **Disclosure of Privacy Principles to Customers:** Royal American Financial Advisors recognizes and respects the privacy expectations of our customers. We want our customers to understand our commitment to privacy in our use of customer information. As a result of our commitment, we have developed these Privacy Principles which are made readily available to our customers. Customers who have questions about these Privacy Principles or have a question about the privacy of their customer information should call John Borger at 888-294-0648 or e-mail him/her at [john@royalam.com](mailto:john@royalam.com).

These Privacy Principles apply to individuals, and we reserve the right to change these Privacy Principles, and any of the policies or procedures described above, at any time without prior notice. These Privacy Principles are for general guidance and do not constitute a contract or create legal rights and do not modify or amend any agreements we have with our customers.

**General Statement:** Royal American Financial Advisors does not disclose any financial information to any non-affiliated third party without prior written approval of its clients.