

# THOMAS FINANCIAL GROUP

**At Thomas Financial Group, your privacy is a priority.** Our relationship with you is our most important asset. We understand that you have entrusted us with your private financial information, and we do everything we can to maintain that trust. The following are details of our approach to privacy.

The collection and use of personal client information is fundamental to our ability to provide and administer financial products and services to you as our clients. We collect and use information for such purposes as evaluating a request for insurance, administering our products or services, evaluating benefit claims, processing requested transactions and offering additional Thomas Financial Group financial products or services.

The Thomas Financial Group privacy policy applies to any person that is a prospective, current or former client. Throughout the policy, we refer to information that personally identifies you or your accounts as “personal information.”

**1. We do not sell your personal information to anyone.**

**2. We do not disclose personal information to third parties, unless one of the following limited exceptions applies:**

We disclose personal information, such as account and transaction data, to companies, including financial institutions that contract with Thomas Financial Group to issue policies, execute transactions, act in a custodial capacity, etc. We have contracts with these companies that prohibit them from using your personal information for their own purposes.

We may disclose personal information to companies that help us process or service your transactions or accounts.

We may disclose or report personal information in limited circumstances where we believe in good faith that disclosure is required by law (example, to cooperate with regulators or law enforcement authorities, resolve consumer disputes, perform credit/authentication checks, or for institutional risk control).

**Outside of these exceptions, we will not share your personal information with third parties unless you have specifically asked us to do so.**

**3. We do collect personal information in the normal course of business in order to administer our accounts and serve you better.**

*Information from Individuals.* Most information we collect is obtained directly from an individual or from that individual’s representative when applying for products or services. For life insurance products, we may collect information pertaining to a person’s health, occupation, avocations or other personal characteristics. We also collect information that you provide to us when you open an account, make application to or through Thomas Financial Group for the purchase of a securities product or service, or to register for one or more of our services such as financial analysis. The information we collect may include name, address, phone number, email address, Social Security number, date of birth, marital status, financial information and information from consumer reporting agencies.

*Information From Third Parties.* If we need to verify information or need additional information, we may obtain information from third parties; for example, consumer-reporting agencies, employers, plan sponsors, third party administrators, insurance companies, etc.

## Protecting your Privacy and Security

### **4. We may share personal information with affiliated companies and regulatory agencies.**

Thomas Financial Group is a Member Firm of the M Financial Group and may offer securities and other investment services through M Holdings Securities, Inc. (“M Securities”), a subsidiary of M Financial Group. M Securities is a registered broker-dealer and investment advisor and is required by its various regulatory authorities such as the U.S. Securities Exchange Commission (SEC), National Association of Securities Dealers, Inc. (NASD), and state jurisdictions to collect, through Thomas Financial Group, review and maintain certain personal information such as investment history, financial data, and employment history, in order to fulfill various regulatory requirements.

### **5. We protect the confidentiality and security of your personal information.**

Companies we hire to provide support services are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of personal information to the performance of the specific service we have requested.

We restrict access to personal information to select employees and agents who have a need for such information for business purposes only. All such employees are trained and required to safeguard such information and have signed confidentiality agreements.

We maintain physical, electric, procedural safeguards to guard your personal information.

### **6. We continue to evaluate our efforts to protect personal information and make every effort to keep your personal information accurate and up to date.**

### **7. We will provide notice of changes in our information-sharing practices.**

If, at any time in the future, it is necessary to disclose any of your personal information in a way that is inconsistent with this policy, we will give you advance notice of the proposed change so that you will have the opportunity to opt out of such disclosure.

### **8. The Health Insurance Portability and Accountability Act of 1996 (“HIPAA”) directly governs the use, disclosure and transmission of individually identifiable health information by insurance companies, health plans and health care providers (“Covered Entities”).** The core of HIPAA is the requirement that Covered Entities maintain the confidentiality of an individual’s health information by limiting the use and disclosure of that information.

In addition, HIPAA indirectly governs third-parties (“Business Associates”), such as insurance brokers and independent agents, that obtain protected health information in the course of providing services to Covered Entities in connection with obtaining health care coverage. HIPAA requires Covered Entities to enter into “Business Associate Agreements” to help the Covered Entity comply with its HIPAA requirements. A Business Associate Agreement generally (i) prohibits the Business Associate from using or disclosing protected health information, and (ii) requires the Business Associate to adopt reasonable safeguards to prevent the use and disclosure of such information.

Accordingly, even though this Privacy Policy already provides substantial safeguards to protect personal health information, we have entered into Business Associate Agreements in those circumstances where we have been asked to do so by a Covered Entity. This provides an added layer of protection for your personal health information.

If you have any questions or concerns, please contact us at our website [www.thomasfinancial.com](http://www.thomasfinancial.com) or call us at 813-273-9416 or toll free at 800-722-2747.