



# ASSOCIATION FINANCIAL SERVICES, LLC

A REGISTERED INVESTMENT ADVISER FIRM

Your Path To A Brighter Future

755 West Big Beaver Road, Suite # 2020 • Troy, MI 48084-4925 | Office: (800) 943-8804 • Fax: (248) 942-4886

Website: [www.association-financial.com](http://www.association-financial.com)

## Privacy Policy

We value the trust our clients have placed in us and are committed to the responsible management, use, and protection of their personal information. Please take a moment to review this Privacy Notice to learn how we protect your information and use it to service your account(s).

### Information We Collect From You

Association Financial Services, LLC (“RIA”), collects personal information about its customers to help it serve their financial needs, process transactions in their account(s), provide customer service, offer new products or services, and fulfill legal and regulatory requirements. RIA collects information about its customers from the following sources:

- information provided to us, our affiliates, or our Investment Adviser Representatives by our customers (such as on account applications and related forms, in discussions with our employees and advisor representatives, or through our website).
- information gathered from our internal files regarding the customer’s transaction history with us (such as products or services purchased, account balances, trading history, and payment history), as well as that provided by information service companies and consumer reporting agencies (such as transactions or credit relationships with unaffiliated third parties).
- information provided by other unaffiliated third parties, including employers, associations, retirement plan benefit sponsors, and other institutions, if the customer transfers positions or funds to us. This information may include “nonpublic, personal information,” which means information that is not readily known or accessible in the public realm, such as the customer’s tax identification number, date of birth, annual income, tax bracket, account balances, transaction history, net worth, assets, income, and medical information (if applying for insurance), as well as the fact that the customer has an account with us.

### Sharing Information

Pursuant to federal law, we may not disclose a customer’s nonpublic, personal information without his/her prior consent, unless the disclosure is needed to:

- provide the services requested by the customer, including:
- clearing, transferring, confirming, or reconciling transactions in the customer’s account(s); and
- providing statements or other records regarding the status or value of the customer’s account(s);
- provide the customer with marketing materials regarding our products and/or services, as well as those offered pursuant to joint agreements with our affiliates or non-affiliated third parties, so long as all parties offering the products and/or services have agreed, in writing, to protect the confidentiality of the customer’s information and to not use it for any other purpose;
- enforce any of our rights, including the collection of any fees or other payments due;

- provide any of RIA’s affiliates with information regarding our operations, or as reasonably required pursuant to the proposed or actual sale, merger, transfer, or exchange of all, or a portion of, our business;
- comply with the request or requirements of regulatory and/or law enforcement organizations;
- respond to a subpoena or discovery request; or
- provide disclosures as otherwise permitted or required by law.

We may provide such information to RIA’s affiliates and/or unaffiliated financial or non-financial services providers (such as insurance companies, mutual fund companies, banks, investment firms, third-party administrators, clearing firms, and other third parties who assist us in providing account maintenance or customer service) as necessary pursuant to the exceptions listed above.

We do not sell, share, or disclose your nonpublic, personal information to unaffiliated third-party marketing companies.

### **Opting Out**

Customers may request that we not disclose their nonpublic, personal information for any reason - other than one of the exceptions listed above.

For example, if an Investment Adviser Representative who has serviced your account(s) terminates his/her registration with RIA, we may permit the advisor representative to share your contact information (name, address, phone number, email address, and account titles) with his/her new firm and use it to contact you for the purpose of requesting your permission to transfer your account(s) to that new firm. In that event, neither the Investment Adviser Representative nor his/her new firm would be permitted to use your contact information for any other purpose or to obtain any other information regarding your accounts without your express written consent. However, because the disclosure of your contact information to an adviser representative’s new firm is not covered by any of the exceptions listed above, you have a right to request that we not disclose your information for this purpose.

To request that we not disclose your information for this or any purpose (other than those covered under the exceptions listed under “Sharing Information,” above), please call us at (800) 943-8804. If we do not receive such a request from you within thirty (30) days of you opening an account, contracting for services, or receiving our annual privacy notice, we have the right to assume that you do not object to the disclosure of your information for any reason permitted by federal law until you notify us to the contrary. Please note that the laws of certain states may impose additional restrictions upon the disclosure of customers’ confidential information.

### **Safeguarding Your Information**

RIA recognizes the need to prevent unauthorized access to the information we collect, including information held in electronic format. RIA authorizes access to your nonpublic, personal information only to personnel who need that information to serve you. We maintain physical, electronic, and procedural safeguards regarding your nonpublic, personal information to ensure that we comply with our own policy, industry practices, and federal and state regulations. If you decide to close your account(s) or become an inactive customer, we will adhere to the privacy policies and practices as described in this notice.

### **Questions**

You do not have to contact us to benefit from our privacy protections; they apply automatically to all of our customers and former customers. If you have any questions after reading this privacy policy, we encourage you to contact your adviser or to write Association Financial Services, LLC, at the address provided above.

<b>FACTS</b>	<b>WHAT DOES ASSOCIATION FINANCIAL SERVICES, LLC, DO WITH YOUR PERSONAL INFORMATION?</b>
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<b>Why?</b>	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
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<b>What?</b>	<p>The types of personal information we collect and share depends on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> <li>• Tax Identification Number, Date of Birth, Telephone Number and Address</li> <li>• Annual Income, Tax Bracket, Account Balances and Transaction History</li> <li>• Net Worth, Assets and Employment History</li> </ul> <p>When you are <i>no longer</i> our customer, we continue to share your information as described in this notice.</p>
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<b>How?</b>	All financial companies need to share clients’ personal information to run their everyday business. In the section below, we list the reasons companies can share their clients’ personal information; the reasons Association Financial Services, LLC, chooses to share; and whether you can limit this sharing.
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Reasons we can share your personal information?	Does Association Financial Services, LLC, Share?	Can you limit this sharing?
<b>For our everyday business purposes</b> - Such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
<b>For our marketing purposes</b> - To offer our products and services to you	Yes	No
<b>For Joint Marketing with other financial companies</b>	No	We don’t share.
<b>For our affiliates’ everyday business purposes</b> - Information about your transactions and experiences	Yes	No
<b>For our affiliates’ everyday business purposes-</b> Information about your creditworthiness	No	We don’t share.
<b>For non-affiliates to market to you</b>	No	We don’t share.

<b>Questions?</b>	<p><b>Office:</b> (800) 943-8804  <b>Fax:</b> (248) 942-4886  <b>Email:</b> <a href="mailto:administrator@association-financial.com">administrator@association-financial.com</a></p>
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Who we are	
Who is providing this notice?	Association Financial Services, LLC

What we do	
<b>How does Association Financial Services, LLC, protect my personal information?</b>	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
<b>How does Association Financial Services LLC collect my personal information?</b>	We collect your personal information, for example, when you <ul style="list-style-type: none"> <li>• Provide your personal information</li> <li>• Seek Investment Advice</li> <li>• Complete an Application</li> </ul> We also collect your personal information from other, such as credit bureaus, affiliates, or other companies.
<b>Why can't I limit all sharing?</b>	Federal law gives you the right to limit only <ul style="list-style-type: none"> <li>• Sharing for affiliates' everyday business purposes-information about your creditworthiness</li> <li>• Affiliates from using your information to market to you</li> <li>• Sharing for non-affiliates to market to you</li> </ul> State laws and individual companies may give you additional rights to limit sharing.

Definitions	
<b>Affiliates</b>	Companies related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> <li>• <i>Association Financial Services, LLC, does not share with affiliates so they can market to you.</i></li> </ul>
<b>Non-affiliates</b>	Companies not related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> <li>• <i>Association Financial Services, LLC, does not share with any non-affiliates so they can market to you.</i></li> </ul>
<b>Joint Marketing</b>	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. <ul style="list-style-type: none"> <li>• <i>Association Financial Services, LLC, does not jointly market.</i></li> </ul>

Other important information	
<b>Our Address:</b> 755 West Big Beaver Road, Suite # 2020 • Troy, MI 48084-4925 <b>Our Website:</b> <a href="https://association-financial.com">https://association-financial.com</a>	