GenFi
Family & Fiduciary Services

GENFI PRIVACY POLICY

The privacy of our clients and the confidentiality personal data and information is of paramount importance to GenFi.

THE BELOW PRIVACY POLICY DETAILS:

- information we collect and utilize to provide agreed upon services
- 3rd party service providers having access to your data:

  Schwab Institutional & Morningstar Office
- Means by which we keep your information secure

PERSONAL INFORMATION WE COLLECT:

- Client Name, Physical home & Work address, email address, phone numbers
- Account numbers, account holdings, income, assets, liabilities
- Other data relevant to planning: estate documents, insurance information
- Data is collected via account applications, questionnaires and specific requests
- GenFi collects and uses client Data ONLY to provide agreed upon services. We do not perform marketing or research related activities or share your data with 3rd parties outside of custody and reporting service providers

PRIVACY OF CLIENT INFORMATION:

GenFi , as a firm, nor any of its personnel, should disclose any nonpublic personal data or information about any client or prospective client to nonaffiliated third party for any reason, unless the client specifically requests to do so. All client advisory agreements include express permission for the firm to share certain nonpublic information with third party service providers for the purposes of performing the firms services and assisting with implementation of the client's financial plan.

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PRIVACY OF CLIENT INFORMATION ELECTRONIC DATA:

- Layer 2 router with anonymous logon's disabled
- Separate VLAN
- FIREWALL provided by EPIC, and AVG
- Confidentiality agreements are in place with all 3rd party service providers including office building
- Authentication to access electronic Storage: single factor, Dual Factor, and adaptive factor
- Additional file level encryption for any files emailed with confidential client data
- Inventory of all electronic devices
- Encryption software utilized: EFS, Checkpoint, Truecript, Touchdown, Ios Data Protection and Erase, Bitlocker, Tresorit (data safe)
- Antivirus software: AVG and AVG Mobile updated daily at 12 noon
- NO use of Remote or online backup for client data
- Data Destruction: Internal Wipe and R-4 Services
- Compliance with Illinois Personal Information protection act
- GenFi has never encountered a breach of security
- GenFi maintains insurance for Cyber Security
- GenFi does not accept trade instructions electronically from clients

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DATA BREACH NOTIFICATION POLICY:

- If a breach is determined to have occurred (any unauthorized acquisition of computerized data that compromises security, confidentiality, or integrity of personal information maintained by GenFi or any 3rd party service provider) GenFi will notify all affected clients via telephone and email. The disclosure notification shall be made in the most expedient time possible without unreasonable delay and will include the approximate date and nature of the breach.
- GenFi will take any measures available and necessary to restore integrity, security, and confidentiality of the data system.

SCHWAB, MORNINGSTAR, BLACK DIAMOND/ADVENT AND RIGHT CAPITAL POLICIES:

- Firewalls and Advanced Encryption technology (128-bit secure Sockets Layer (SSL3) encryption
- SchwabSafe security measures including encryption, activity scanning, and security guarantee: Schwab will cover 100% of losses in any of your accounts from unauthorized activity
- Availability of VeriSign token or two factor authentication via app for Schwab login
- No selling of information
- Restriction on account access
- Training of employees on privacy and security
- Communications with clients on ways to keep your information safe
- Internal review of security measures (physical and data)

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GENFI ANNUAL ADV OFFER

INVESTMENT ADVISORS DISCLOSURE BROCHURE

Under rule 2014-3 of the investment advisors act of 1940, Registered investment advisors are required to offer each client a current copy of the investment advisors disclosure brochure.

If you'd like a copy of the Investment Advisors Disclosure Brochure please contact us and you may request this at any time. You can also obtain further advisor information at www.advisorinfo.sec.gov.

Our contact information is as follows:

Www.genfiffs.com

Email: jzakarias@generationsffs.com

Phone: 872.213.1113

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GENFI SUPPLEMENTAL PRIVACY INFORMATION

FACTS	What Does GENFI Do With Your Personal Information?
Why?	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.
What?	The types of personal information we collect and share depend on the product or service you have with us. This information can include: Income Employment and residential information Social security number Cash balance Security balances Transaction detail history Investment objectives, goals, and risk tolerance When you close your account, we continue to share information about you according to our policies.
How?	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons GENFI chooses to share; and whether you can limit this sharing.

Please Note: If you are a *new* customer, we do not share your personal information other than to provide services or as otherwise legally required. When you are *no longer* our customer, this policy continues to apply to you.

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GENFI SUPPLEMENTAL PRIVACY INFORMATION

Definitions	
Everyday Business Purposes	The actions necessary by financial companies to run their business and manage customer accounts, such as providing investment advisory and financial planning advice, processing securities transactions, and otherwise providing financial services to you.
Affiliates	GENFI does not have affiliate entities.
Non-Affiliates	GENFI does not share information with non-affiliates for marketing purposes.
Joint Marketing	GENFI does not engage in joint marketing with non-affiliates.

Reasons we can share your personal information	Does GENFI share?	Can you limit this sharing?
For our everyday business purposes—such as to provide advice, process your transactions, and maintain your account(s)	Yes	No
For our marketing purposes—to offer our products and services to you	No	We do not share
For joint marketing with other financial companies	No	We do not share
For our affiliates' everyday business purposes—information about your transactions and experiences	No	We do not share
For our affiliates' everyday business purposes—information about your creditworthiness	No	We do not share
For our affiliates to market to you	No	We do not share
For non-affiliates to market to you	No	We do not share
Contact Us	Call 872-213-1113	

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Sharing Practices	
How often does GENFI notify me about their practices?	We must notify you about our sharing practices when you open an account and each year while you are a customer.
How does GENFI protect my personal information?	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.
How does GENFI collect my personal information?	We collect your personal information, for example, when you establish an investment advisory relationship contract for financial planning services open an account or deposit money with custodians purchase or sell securities with executing broker-dealers We also collect your personal information from others, such as custodians, broker-dealers, or other companies.
Why can't I limit all sharing?	Federal law gives you the right to limit sharing only for affiliates' everyday business purposes—information about your creditworthiness affiliates to market to you non-affiliates to market to you State laws and individual companies may give you additional rights to limit sharing.