COUNTER BALANCE

DIVORCE SOLUTIONS

Privacy Policy & Information Security

The privacy policy statement is given to clients at the initial signing of the client contract and mailed or emailed once annually. The CCO will document the date the PPS was mailed to each client for each year. Counterbalance Divorce Solutions collects nonpublic personal information about you from the following sources:

- Information we receive from you on applications or other forms
- Information about your transactions with us or others
- Information we receive from a consumer reporting agency

We do not disclose any nonpublic personal information about you to anyone except previously agreed or as permitted by law. If you become an inactive customer, we will adhere to the privacy policies and practices described in this notice.

Counterbalance Divorce Solutions restricts access to your personal and account information to those employees who need to know that information to provide products or services to you. We maintain physical, electronic, and procedural safeguards to guard your nonpublic personal information.

The following employees will manage nonpublic information: Kyle Eaton.

The following systems may be vulnerable to a breach of your nonpublic information: Salesforce, Dropbox, Microsoft, Family Law Software, Income Lab, Zoom, Tiller, Zocks, and Anthropic (Claude).

To mitigate a possible breach of private information, Counterbalance Divorce Solutions will encrypt all data that individuals have access to or use password-sensitive documents. The security system will be reviewed, tested, and monitored annually.

We have taken extensive measures to safeguard the privacy and integrity of the information we gather, store, and archive during regular business practices. Computer security measures, including passwords, backups, and encryption, have been instituted where applicable. All employees are informed and instructed on various security measures, including the non-discussion and/or sharing of client information, constantly removing client files from desktops or working areas that cannot be locked or secured, and proper storage of client securities files in locked files or

other secured location. We use various methods to store and archive client files and other information. All third-party services or contractors have been made aware of the importance we place on firm and client information security.

In addition to electronic and personnel measures, we have implemented reasonable physical security measures at our home and meeting office locations.

We will retain records for at least 3 years or as otherwise required by applicable state or federal law. Concerning the disposal of nonpublic personal information, we will take reasonable measures to protect against unauthorized access to or use of such information in connection with its disposal.



Kyle Eaton, CDFA®
President
Counterbalance Divorce Solutions