

# PRIVACY POLICY

This Privacy Policy (“Policy”) details the manner in which Independent Financial Partners (“IFP,” “we,” “our,” or “us”) collects, uses, and discloses information when you (“you” or “your”): (i) interact with us as an IFP customer of our services (the “Services”), or (ii) visit www.ifpartners.com (the “Website”), or otherwise communicate with us.

## CUSTOMER PRIVACY DISCLOSURES

This Privacy Policy notice is provided to you on behalf of Independent Financial Partners (“IFP”). This notice has been prepared to describe to you what IFP collects, and how IFP collects, handles, and safeguards your personal information. Please read this notice carefully to understand your privacy rights.

Facts	What Does Independent Financial Partners 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 of their personal information. Federal law also requires IFP to tell you how it collects, shares, and protects your personal information. IFP’s Privacy Policy tells you how we collect, share and protect your personal information and provides you with an opportunity to opt out of sharing in certain circumstances as described below.	
What?	The types of personal information we collect can include: <ul style="list-style-type: none"> <li>• Name, Address, Social Security number and Date of Birth</li> <li>• Income, Assets, Net Worth and Investment Experience</li> <li>• Account Balances and Transaction History</li> </ul> When you are no longer our customer, IFP will continue to maintain your personal information and share it as described below in this notice.	
How?	All financial companies need to share their customers’ personal information to conduct their daily business. In the section below, IFP lists what it does share and the reasons for sharing your personal information, and whether you can limit this sharing.	
Reasons We Can Share Your Personal Information*	Does IFP share?	Can you limit this sharing?
For our business purposes, including to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes to offer our products and services to you	Yes	No
For joint marketing with other financial companies	Yes	No
For our affiliates to market products and services to you	No	No
For our affiliates’ business purposes – information about your creditworthiness	No	No
For non-affiliates to market to you and/or to conduct their business	No	No
What we do		
How does IFP protect my personal information?	To protect your personal information from unauthorized access and use, IFP uses security measures that comply with federal law. IFP has implemented security standards and processes as well as physical, electronic and procedural safeguards – including training and confidentiality agreements - designed to protect your personal information.	
How does IFP collect my personal information?	IFP collects your personal information when you: <ul style="list-style-type: none"> <li>• Sign an investment advisory agreement to permit your Advisor to manage your assets</li> <li>• Open an account with your Advisor through IFP</li> <li>• Provide information to your Advisor about details of your accounts, investments or retirement assets</li> <li>• Execute investment transactions in your account</li> </ul> IFP also collects your personal information from others such as credit bureaus, affiliates, or other companies.	
Why can’t I limit all sharing?	Why can’t I limit all sharing? Federal law gives you the right to limit only: <ul style="list-style-type: none"> <li>• Sharing for affiliates’ business purposes – information about your creditworthiness</li> <li>• Affiliates from using your information to market products and services to you</li> <li>• Sharing for non-affiliates to market products and services to you</li> </ul> State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.	
How does IFP treat my personal information once I am no longer a customer?	The firm will provide personal information about former customers only if required to do so by law or regulation or to those parties who need such information in order for IFP to carry out any continued obligation with respect to the services provided from its relationship with you. If your independent representative terminates his or her relationship with us and moves to another brokerage or investment advisory firm, we or your independent representative may disclose your personal information to the new firm, unless you instruct us otherwise by returning the completed Privacy Choices Notice form attached to this notice. *For customers in Alaska, California, Massachusetts, Maine, New Mexico, North Dakota, Minnesota and Vermont please see below.	

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Important Information		
<p><b>Information for Alaska Customers</b> In response to Alaska law, if your financial advisor terminates his or her relationship with IFP and transfers to another brokerage or investment advisory firm and your primary address is in Alaska, you must give your written consent before IFP will allow your financial advisor to take any of your personal information to his or her new brokerage or investment advisory firm.</p> <p><b>Information for California Customers</b> In response to California law, IFP automatically treat accounts with California billing addresses as if you do not want to disclose personal information about you to non-affiliated third parties except as permitted by the applicable California law.</p>	<p><b>Information for Massachusetts Customers</b> IFP shall implement and maintain a comprehensive information security program which contains administrative, technical and physical safeguards that are appropriate to safeguard the Confidential Information it receives from its clients and which are consistent with any applicable federal and/or state statutes or regulations.</p> <p><b>Information for Maine Customers</b> For further information, please contact the state at (207) 624-8551.</p> <p><b>Information for New Mexico Customers</b> For further information, please contact the state at (505) 476-4580</p>	<p><b>Information for North Dakota Customers</b> For further information, please contact the state at (701) 328- 2910.</p> <p><b>State of Minnesota Customers</b> For further information, please contact the state at (651) 539-1638</p> <p><b>Information for Vermont Customers</b> In response to a Vermont regulation, if we disclose personal information about you to non-affiliated third parties with whom we have joint marketing agreements, we will only disclose your name, address, other contact information, and information about our transactions or experiences with you.</p>

## MAIL-IN FORM

### Privacy Choices Notice

(To be used by clients of Independent Financial Partners)

If you would like to limit the personal information that your Advisor could disclose or take if he or she terminates with IFP and transfers to another investment firm, please complete and mail the following form to:

Compliance Department  
Independent Financial Partners  
3030 N. Rocky Point Dr. W., Suite 700  
Tampa, FL 33607

You can withdraw your opt-out choice at any time by contacting IFP in writing at the address above.

If your primary address is in a state that requires your affirmative consent to share your personal information in the states named above, then you must give your written consent before your Advisor may take any of your personal information to his or her new firm.

Limit the personal information about me that my financial advisor could disclose or take if he or she terminates with IFP and transfers to another investment firm. You understand that Independent Financial Partners may disclose your name, address, telephone number, email and the account title of the accounts serviced by your Advisor to his or her new firm as allowed under federal and certain state laws.

Advisor's Name

Please note that for accounts held jointly by two or more persons, the privacy choices made by any account holder apply to all joint holders with respect to the account. In order for your opt-out election to be effective, you must complete ALL of the following information:

### CUSTOMER 1:

Name		
Address		
City	State	Zip
Phone Number	Account or SSN	
Signature	Date	

# PRIVACY POLICY

## WEBSITE AND GENERAL INQUIRY PRIVACY DISCLOSURES

### GEOGRAPHIC DISCLAIMER

IFP is located within the State of Florida, USA and provides its Services exclusively to customers within the United States. IFP does not market to or otherwise solicit information of any kind from individuals located outside of the United States, including the European Union and United Kingdom. Any use of this Website from outside of the United States is entirely at your own risk.

### WHAT INFORMATION DOES IFP COLLECT ON THE WEBSITE?

The information that we collect from you on our Website or through a general inquiry that you communicate to us either on the Website or by otherwise contacting us depends upon your interactions with us and whether you are a IFP customer or financial professional as detailed more fully below:

- Our Website enables you to Get In Touch with IFP and if you choose to complete the applicable web form, we will collect your first name, last name, email address, phone number (optional), and the content of any message that you choose to provide us (collectively, "[General Inquiry Information](#)").
- If you are interested in any career opportunities that may be available with IFP and click the Careers hyperlink on our Website, you will be redirected to a third party website where you have the option to explore any open positions and to Easy Apply through the LinkedIn social media platform. We will collect your resume, including any relevant educational information, professional experience, contact information, and we will have access to any information contained on your LinkedIn profile (collectively, "[Applicant Information](#)").
- You can follow IFP on social media and our Website includes hyperlinks to our LinkedIn, Instagram, Facebook, Twitter, and YouTube accounts. If you contact us through one of our social media accounts, we will collect your username, first and last name (if applicable to the social media platform), and the content of any message that you choose to include when contacting us (collectively, "[Social Media Inquiry Information](#)").

### Internet Cookies

IFP's Website uses internet cookies. Internet cookies are small data files that are deployed from a web server to your computing device when you visit a Website. Internet cookies enable the collection of certain data in connection with your visit to the Website. An overview of the types of internet cookies utilized on our Website is included below:

- [Strictly Necessary Cookies](#) – Our Website utilizes strictly necessary cookies to enable the Website to function and to display our content. We use strictly necessary cookies to enable you to fill out web forms and submit information to us and to address core functionality, including managing web traffic to the Website, security, and accessibility.
- [Analytics Cookies](#) – We utilize a third party analytics service provider to collect analytics information regarding users to our Website. These internet cookies collect information from you including your internet protocol address, a unique identifier, the time and date you arrived on our Website, the duration of your visit to our Website, your computing device type, internet browser name and version, and the domain of your internet service provider (collectively, "Usage Information").
- [Marketing Pixels](#) – IFP utilizes third party vendors that deploy tracking pixels on our Website, which collect information from users that visit IFP while logged into their social media account that is used for serving those users with targeted email and website advertising. The information that is collected from marketing pixels includes your social media account username or identifier (collectively, "Pixel Information").

Depending upon your internet web browser or computing device, you may have the option to block or reject internet cookies from being deployed to your computing device. Please consult your computing device's or internet web browser's help file for more information regarding your options for internet cookies. Please note that if you choose to block or reject internet cookies, some functionality on the Website will no longer function and the Website may not be displayed as intended.

### HOW DOES IFP USE THE INFORMATION THAT IT COLLECTS FROM THE WEBSITE?

The manner in which we use the information that we collect on or through the Website is detailed below:

- We use General Inquiry Information for purposes of responding to your inquiry of us. We will also use General Inquiry Information to communicate with you regarding updates about IFP's services and information and your General Inquiry Information will be stored in our relationship management database. To the extent that you are a financial professional seeking to establish a professional relationship with IFP, we will use your General Inquiry Information to communicate and establish your account.
- Applicant Information is used in connection with our employment screening process, which includes evaluating whether you might be a good candidate for employment, scheduling an interview, and in connection with onboarding if a candidate is selected for employment.
- Social Media Inquiry Information is used for the purpose of responding to your specific inquiry of us. We will also store Social Media Inquiry Information in our database to the extent that you are a client lead or an existing advisor or client of IFP.
- IFP uses the Usage Information collected from internet cookies for its internal business purposes, including (i) detecting and troubleshooting issues with our Website, (ii) understanding basic demographic information regarding those who visit our Website, (iii) evaluating the effectiveness of our marketing and advertising efforts, (iv) identifying the most common computing device and internet browsers to optimize your viewing experience, (iv) for data security and to combat fraud and malicious activities on our Website.
- Pixel Information is utilized for purposes of targeted marketing and advertising efforts by IFP and our third party service providers on our behalf. Pixel Information collected from these activities may be associated with other personal information by IFP and our service providers, including your email or home address. IFP (or service providers on our behalf) will send communications to these email or home addresses unless you opt out of receiving this advertising by visiting <https://app.retention.com/optout>.

### DOES IFP DISCLOSE THE INFORMATION THAT IT COLLECTS FROM THE WEBSITE TO THIRD PARTIES?

IFP utilizes third party service providers to make the Website and our Services available to you and in working with financial professionals. These third party service provider render services including website and data hosting, software, human resources, telecommunications, marketing, advertising, analytics, accounting, billing, and legal services. These third party service providers are only permitted to use the information that we make available to them for purposes of providing their services to IFP.

Unless otherwise required by applicable law, we will disclose the information that we have collected from or about you on our Website under the following circumstances:

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## Legal Process

If IFP is required by applicable law to provide information about you, including in response to a subpoena, warrant, or other legal process, we will comply with any such legal requirement. Please note that IFP reserves the right to assert a legal challenge in the appropriate legal forum in response to any legally compelled disclosure of your information, which shall occur in our sole discretion. Subject to applicable law, we will also disclose information about you that we have collected or otherwise maintain if we determine that such a disclosure is required to protect IFP or the safety of a third party.

## Sale or Business Reorganization

If all or substantially all of IFP's assets are acquired by another entity or IFP merges with another organization, then the information that we have collected from and about you in connection with your use of the Website, Services, or both will be among the assets provided to the acquiring entity unless such disclosure is prohibited by applicable law.

## CHILDREN'S ONLINE PRIVACY

IFP does not knowingly market to or otherwise solicit Personal Information from children under the age of thirteen. For purposes of this Section of the Policy, the term "Personal Information" has the meaning provided under the Children's Online Privacy Protection Act (15 U.S.C. § 6501, et. al.) and its regulations, which includes first and last name, home or other physical address, email address, telephone number, social security number, or other identifiers. If you are a child under the age of eighteen, please do not submit Personal Information to us on or through the Website. If you are the parent or legal guardian of a child who is under the age of eighteen and you believe that your child may have provided us with Personal Information, please contact us by any of the means provided under the Section "Contact Us," which is located at the bottom of this Policy and we will promptly remove your child's information from our system.

## THIRD PARTY HYPERLINKS

Our Website includes a number of hyperlinks to other third party websites that are not owned or operated by IFP (each, a "Third Party Website"). These Third Party Websites are provided for your convenience and for informational purposes only. You hereby acknowledge and agree that IFP has no control over any of the content, information, business, or privacy practices of any Third Party Website, including any products or services that may be available on or through any such Third Party Website. Your use of any Third Party Website is entirely at your own risk. Under no circumstances whatsoever will IFP be liable to you or any other party in connection with your use of a Third Party Website.

## REVISIONS TO THIS POLICY

IFP reserves the right to revise this Policy from time to time in our sole discretion. Each time we revise this Policy, we will update the Date that is listed at the bottom of this Policy. In the event that we make a material change to the manner in which we collect, use, or disclose information, we will post a notice to the main page of our Website to bring this to your attention. It is your responsibility to regularly check this Policy for any updates. Unless otherwise prohibited by applicable law, changes to this Policy will become effective upon their posting. Your use of the Website following any change to this Policy shall constitute your unconditional acceptance of any change. If you disagree with a revision, then you must immediately cease your use of the Website.

## STATE-SPECIFIC DISCLOSURES

### IFP PRIVACY POLICY FOR CALIFORNIA RESIDENTS

Last Modified Date: July 17, 2023

This Privacy Policy for California Residents supplements the information contained in the Policy above and applies solely to all visitors, users, and others who reside in the State of California ("consumers" or "you"). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (CCPA) and any terms defined in the CCPA have the same meaning when used in this Policy.

#### Information We Collect

We collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device ("personal information"). Personal information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.

In particular, we have collected the following categories of personal information from consumers within the last twelve (12) months:

Category	Examples	Collected
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	YES
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.  Some personal information included in this category may overlap with other categories.	YES

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Category	Examples	Collected
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	YES
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer’s interaction with a website, application, or advertisement.	YES
G. Geolocation data.	Physical location or movements.	YES
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
I. Professional or employment-related information.	Current or past job history or performance evaluations.	YES
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO
K. Inferences drawn from other personal information.	Profile reflecting a person’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	YES

We obtain the categories of personal information listed above from the following categories of sources:

- Directly from you. For example, from forms you complete for the services that you purchase.
- Indirectly from you. For example, from observing your actions on our Website.

## Use of Personal Information

We may use or disclose the personal information that we collect for one or more of the following purposes:

- To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to ask a question about our services, we will use that personal information to respond to your inquiry. If you provide your personal information to purchase a service, we will use that information to process your payment and facilitate delivery. We may also save your information to facilitate new product orders or process returns.
- To provide, support, and develop our Website, and services.
- To create, maintain, customize, and secure your account with us.
- To process your requests, purchases, transactions, and payments and prevent transactional fraud.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To deliver content and product and service offerings relevant to your interests, including targeted offers and ads through our Website, third-party sites, and via email or text message (with your consent, where required by law).
- To help maintain the safety, security, and integrity of our Website, services, databases and other technology assets, and business.
- For testing, research, analysis, and product development, including to develop and improve our Website, and services.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about our consumers and financial partners is among the assets transferred.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

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## Sharing Personal Information

We may share your personal information by disclosing it to a third party for a business purpose. We only make these business purpose disclosures under written contracts that describe the purposes, require the recipient to keep the personal information confidential, and prohibit using the disclosed information for any purpose except performing the contract. In the preceding twelve (12) months, Company has disclosed personal information for a business purpose to the categories of third parties indicated in the chart below.

We may also share your personal information by selling it to third parties or sharing it in connection with targeted behavioral advertisement, subject to your right to opt-out of the sharing or those sales. Our personal information sales do not include information about individuals we know are under age 16. In the preceding twelve (12) months, Company has sold the following categories of personal information to the categories of third parties indicated in the chart below]. For more on your personal information sale rights, see Personal Information Sales Opt-Out and Opt-In Rights.

Personal Information Category	Category of Third-Party Recipients	
	Business Purpose Disclosures	Sales
A: Identifiers.	Website and data hosting, and human resources service providers	Marketing, advertising, and analytics service providers
B: California Customer Records personal information categories.	Website and data hosting, and human resources service providers	Marketing, advertising, and analytics service providers
C: Protected classification characteristics under California or federal law.	Data hosting and human resources service providers	None
D: Commercial information.	Data hosting	None
E: Biometric information.	None	None
F: Internet or other similar network activity.	Analytics and marketing service providers	Marketing, advertising, and analytics service providers
G: Geolocation data.	Analytics and marketing service providers	Marketing, advertising, and analytics service providers
H: Sensory data.	None	None
I: Professional or employment-related information.	Data hosting and human resources service providers	None
J: Non-public education information.	None	None
K: Inferences drawn from other personal information.	None	None

## RESELLING PERSONAL INFORMATION

The CCPA prohibits a third party from reselling personal information unless you have received explicit notice and an opportunity to opt-out of further sales. The following businesses purchase personal information from us and may resell that information. To opt-out of those sales, please visit that business's opt-out notice at link provided below.

Google Analytics: <https://tools.google.com/dlpage/gaoptout>

Marketing and Advertising Pixels: <https://app.retention.com/optout>

## Your Rights and Choices

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

### Right to Know and Data Portability

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months (the "right to know"). Once we receive your request and confirm your identity (see [Exercising Your Rights to Know or Delete](#)), we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
  - sales, identifying the personal information categories that each category of recipient purchased; and
  - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.
- The specific pieces of personal information we collected about you (also called a data portability request).

We do not provide a right to know or data portability disclosure for B2B personal information.

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## Right to Delete

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions (the "right to delete"). Once we receive your request and confirm your identity (see Exercising Your Rights to Know or Delete), we will review your request to see if an exception allowing us to retain the information applies. We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

1. Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, or otherwise perform our contract with you.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
6. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
8. Comply with a legal obligation.
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

We will delete or deidentify personal information not subject to one of these exceptions from our records and will direct our service providers to take similar action.

We do not provide these deletion rights for B2B personal information.

## Exercising Your Rights to Know or Delete

To exercise your rights to know or delete described above, please submit a request by either:

Calling us at 1-833-NEED-IFP.

Emailing us at [marketing@ifpartners.com](mailto:marketing@ifpartners.com).

Only you, or someone legally authorized to act on your behalf, may make a request to know or delete related to your personal information. Only you, or someone legally authorized to act on your behalf, may make a request to know or delete related to your personal information. California consumers may use an authorized agent on their behalf to exercise a privacy right discussed above. If you are an authorized agent acting on behalf of a California consumer to communicate with us or to exercise a privacy right discussed above, you must be able to demonstrate to IFP that you have the requisite authorization to act on behalf of the resident and have sufficient access to their laptop, desktop, or mobile device to exercise these rights digitally. If you are an authorized agent trying to exercise rights on behalf of an IFP consumer, please contact us at the contact information below with supporting verification information, proof that you have access to the consumer's interface, and proof of your own identity.

You may only submit a request to know twice within a 12-month period. Your request to know or delete must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative, which may include:
  - Requiring the authorized representative to identify directly with our business.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

You do not need to create an account with us to submit a request to know or delete.

We will only use personal information provided in the request to verify the requestor's identity or authority to make it.

For instructions on exercising your sale opt-out or opt-in rights, see [Personal Information Sales Opt-Out and Opt-In Rights](#).

## Response Timing and Format

We will confirm receipt of your request within ten (10) business days. If you do not receive confirmation within the 10-day timeframe, please contact [marketing@ifpartners.com](mailto:marketing@ifpartners.com).

We endeavor to substantively respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to another 45 days), we will inform you of the reason and extension period in writing.

If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the 12-month period preceding our receipt of your request. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

## Personal Information Sales Opt-Out and Opt-In Rights

If you are age 16 or older, you have the right to direct us to not sell your personal information at any time (the "right to opt-out"). We do not sell the personal information of consumers we actually know are less than 16 years old. Consumers who opt-in to personal information sales may opt-out of future sales at any time.

To exercise the right to opt-out, you (or your authorized representative) may submit a request to us by visiting the following Internet Web page link:

<https://ifpartners.com/dnsmpi/>

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## “DO NOT SELL OR SHARE MY PERSONAL INFORMATION”

Once you make an opt-out request, we will wait at least twelve (12) months before asking you to reauthorize personal information sales. However, you may change your mind and opt back in to personal information sales at any time by:

**If you choose to opt-in after we fulfill an opt-out request for selling or sharing your personal information, you may do so by emailing [marketing@ifpartners.com](mailto:marketing@ifpartners.com) and making the request.**

You do not need to create an account with us to exercise your opt-out rights. We will only use personal information provided in an opt-out request to review and comply with the request.

## Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

However, we may offer you certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your personal information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt-in consent, which you may revoke at any time.

## Other California Privacy Rights

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our Website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email to [marketing@ifpartners.com](mailto:marketing@ifpartners.com).

## CHANGES TO OUR PRIVACY POLICY

We reserve the right to amend this privacy policy at our discretion and at any time. When we make changes to this privacy policy, we will post the updated notice on the Website and update the notice's Last Modified Date. Your continued use of our Website following the posting of changes constitutes your acceptance of such changes.

## CONTACT INFORMATION

If you have any questions or comments about this notice, the ways in which Company collects and uses your information described here and in our Privacy Policy, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

**Phone:** 1-833-NEED-IFP

**Email:** [marketing@ifpartners.com](mailto:marketing@ifpartners.com)

### Postal Address:

Independent Financial Partners  
Attn: Design Group  
3030 N Rocky Point Dr W  
Tampa, FL 33607

If you need to access this Policy in an alternative format due to having a disability, please contact [marketing@ifpartners.com](mailto:marketing@ifpartners.com) and 1-833-NEED-IFP.