

PRIVACY NOTICE August 2012

Heling Associates, Inc., (HA) a financial planning and investment advisory firm, routinely collects and maintains a variety of sensitive personal information from and about its clients and those who are considering an advisory relationship with the firm. We obtain this information from forms you complete, discussions we hold with you and your other advisers, statements and other documents you provide, information we may obtain from consumer reporting agencies, and various other sources. This notice describes our policies with regard to this information.

Why You're Getting This Notice. Federal law requires that we provide this Privacy Notice to all clients at least once in every twelve-month period, and any time that our privacy policies change.

What to Do. Please take the time to read these policies thoroughly. If you wish, you may instruct HA to alter its policies with regard to your personal information by completing and submitting the accompanying *Privacy Restriction Notice and Information-Sharing Authorization*.

Types of Information We Keep. The categories of nonpublic personal information that we collect depend upon the nature and scope of client engagement or relationship and might include information about:

- you, members of your family, and business associates
- your personal and business finances
- your health (to the extent needed for the financial planning process)
- transactions between you and third parties
- tax, legal and estate planning strategies and documents

Confidentiality. As a matter of both policy and practice, we treat all information provided us about clients and consumers as strictly confidential. It is our intent to protect both your identity and your information except as described in this notice.

Information-Sharing.

Those with whom we might share your information fall into five categories:

1. Parties with whom we are required by law or regulation to share information
2. Parties with whom we are permitted by law or regulation to share information
3. Other providers of financial or legal services
4. Family members
5. All others

Our policies with regard to sharing your personal information with parties in these categories is described below. With the exception of those with whom we are required to share information, you may instruct us to alter our policies as they regard your personal information by completing the accompanying *Privacy Restriction Notice and Information-Sharing Authorization*.

Parties with whom we are required to share information. Federal and state laws require open access to the firm's books and records to securities regulators. In addition, courts may issue subpoenas or other judicial orders requiring the firm to divulge specific information. We will fully comply with such laws, regulations, and court orders.

Parties with whom we are permitted by law or regulation to share information. Federal and state laws permit sharing certain information with other regulated parties that may be providing service to you, the most common of which are licensed and regulated broker/dealers and their authorized agents. It is the firm's policy to provide any and all information to such parties relevant to the services to be provided. If you wish to limit such information-sharing, you should describe such limitations on the accompanying *Privacy Restriction Notice and Information-Sharing Authorization*.

Other providers of financial or legal services. Financial planning is, by its nature, a collaborative process that benefits from the informed input of your financial planner as well as your accountants, attorneys, insurance agents, and others you may identify as being a personal advisor.

If you have identified another professional as an advisor, HA considers that you have implicitly authorized us to share with that advisor any and all information relevant to the services being provided and will share information accordingly. If you wish to restrict such routine information-sharing, you should so indicate on the accompanying *Privacy Restriction Notice and Information-Sharing Authorization*.

Family members. In the absence of a valid power of attorney, trustee designation, or other legal document conferring custodial powers, the confidentiality of your personal information extends to non-spousal family members unless you authorize us, using the *Privacy Restriction Notice and Information-Sharing Authorization*, to share information with specified family members.

If you are a client of HA but your spouse is not, the confidentiality of your personal information will extend to your spouse as well, unless HA is compelled by a court of appropriate jurisdiction to share your information.

If you wish HA to share your personal information with a family member or other trusted person, you should note that authority on the accompanying *Privacy Restriction Notice and Information-Sharing Authorization*. Such notice will authorize us only to share information. It does not grant us authority to accept instructions from a family member. To grant authority beyond information-sharing, you must either deliver a properly executed and operative power of attorney to HA.

All others. We will not share information about you with anyone not included in the above categories without your express consent. This includes:

- Marketing lists. We will never sell or exchange your name or contact information to any third party for the purposes of marketing services to you.
- Referrals. We will never provide your name or contact information as reference to a prospective client without your consent expressed on a case-by-case basis. HA no longer maintains a list of referral providers.

How Long We Keep Personal Information.

Personally identifiable information about you will be maintained during the time you are a client, and for the required time thereafter that such records are required to be maintained by federal and state securities laws, and consistent with the CFP Board Code of Ethics and Professional Responsibility. After this required period of record retention, all such information will be destroyed.

Data Security. HA makes every effort to protect your information from inadvertent or willful access by third parties.

- Our office is within the residence of our firm's principal which is, by its very nature, not available to the public.
- We maintain a secure computer environment to protect data from unauthorized external access. Including:
 - secure passwords at the operating system level and for information maintained on others' servers
 - internal and external anti-virus screening programs
 - anti-malware software
 - computer-level "firewall" technology
- a multi-dimensional data backup procedure to protect data from loss due to hardware failure or facility damage. Backup procedures include:
 - Continuous in-day file backups to secure off-site servers
 - Nightly, weekly, and monthly automatic data backups to an in-house external drive
 - Monthly transfers of a full backup to a second external drive stored in the firm's bank safe deposit box.

Taken together, we believe our security practices and policies ensure that your information is not placed at unreasonable risk.

What You Should Do Next

Please take a moment to consider your personal situation and your desires with regard to information-sharing.

Should you wish to restrict or authorize our sharing of your nonpublic personal information with your other advisors, or with other persons that you designate, in ways that are not described in the above policy, you may complete and return the *Privacy Restriction Notice and Information-Sharing Authorization* at any time.

You should complete this form again now, even if you have submitted it in the past, to ensure that your instructions to us are current.

Privacy Restriction Notice and Information-Sharing Authorization

Section 1 – Revocation of blanket authorization to share information with parties with which sharing is permitted by law and regulation. Check below only if you wish to restrict Heling Associates’ ability to share information with such parties.

- I hereby instruct Heling Associates, Inc. to secure my specific authorization to share information with parties which are permitted access to such information by law or regulation. I understand that my failure to provide such authorization may result in my inability to do business with such parties.
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Section 2 – Restriction of authority to share personal information with identified financial, legal, tax or other advisors. Heling Associates will routinely share information about you with other professionals you have from time to time identified as being your advisor when such information is relevant to the services they are to provide. If you wish to restrict this authority in any way, please describe the limits you wish to place on such information-sharing below. If you do not wish to restrict HA’s authority beyond its stated policy, you may leave this section blank.

Advisor Type	Advisor Name or Firm Name	Prior Authority Required	Other Restriction(s)
Attorney			
Accountant			
Insurance Agent or Co.			
Banks or Lenders			
Other (describe)			

Section 3 – Family Members

Non-client Spouse. If both you and your spouse are clients of Heling Associates (HA), then HA will not withhold personal information from either spouse. If your spouse is not a client, then HA will not share your personal information with your spouse unless (1) compelled to do so by a court or other legitimate authority or (2) you authorize such sharing. If you wish to authorize such sharing, check the line below.

- My spouse is not a client of Heling Associates, Inc. (HA) but I hereby authorize HA to share my personal information with my spouse. Any restrictions on such sharing are described below; if no restrictions are listed, HA will share information is authorized to share information with my spouse as if my spouse were an HA client.
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Restrictions on information-sharing:

Section 3 (continued) - Other Family Members or Other Trusted Persons. I hereby authorize Heling Associates (HA) to share my personal information with the family members or other persons named below and further authorize HA to rely upon a person’s representation that they are the person named when sharing such information. I understand that this authority does not grant authority to such named persons to make financial decisions or to order transactions on my behalf.

Name	Relationship	Share Any Information	Share Limited Information (describe limitations)

I hereby instruct Heling Associates, Inc. to secure my specific authorization to share information with parties which are permitted access to such information by law or regulation. I understand that my failure to provide such authorization may result in my inability to do business with such parties.

Authorization

By signing, dating, and delivering this form, I understand that I am instructing Heling Associates, Inc. to alter its privacy and information-sharing polices as regards the personal information the firm maintains on or about me. I understand that this authorization will remain in effect until replaced, supplemented, or revoked in writing by me, or until I cease to be a client of Heling Associates, Inc.. I further understand that Heling Associates, Inc. reserves the right to revoke information-sharing authorizations granted (but not information-sharing limitations imposed) by this document at any time.

Signed _____

Date _____

Date _____