

# Privacy Policy for Infinity Financial Strategies, LLC as of June 14, 2024

Infinity Financial Strategies, LLC ("Infinity") recognizes that our relationships with current and prospective clients are based on integrity and trust. We work hard to maintain your privacy and to preserve the private nature of our relationship with you. We place the highest value on the information you share with us. Infinity will not disclose your personal information to anyone unless it is required by law or at your direction. We will not sell your personal information. Infinity will provide the privacy statement to all clients annually.

We want our clients to understand what information we collect, how we use it, and how we protect it responsibly.

### Why We Collect Your Information

We gather information about you so that we can:

- Help design and implement the investment and planning related services we provide you; and
- Comply with the Federal and State laws and regulations that govern us.

#### What Information We Collect and Maintain

We may collect the following types of nonpublic personal information ("NPI") about you:

- Information from our initial meeting or subsequent consultations about your identity, such as your name, address, social security number, date of birth, and financial information.
- Information that we generate to service your financial needs.
- Information that we may receive from third parties with respect to your financial profile.

This type of NPI may be disclosed to other entities as further described below.

# What Information We Disclose

We are permitted by law to disclose nonpublic information about you to unaffiliated third parties in certain circumstances. Infinity may disclose client's NPI:

- 1) to individuals and/or entities not affiliated with Infinity, including, but not limited to third parties that assist in the supervision or management of your account(s). This includes the following:
  - a. Your account custodian, such as Charles Schwab & Co., Inc.
  - b. Held Away-Account Management tools, such as Pontera
- 2) to service providers contracted by us in order for us to perform the duties in furtherance of the client's engagement with Infinity (i.e. client management systems, archiving technology vendors, cloud service providers, etc.);
- 3) to your authorized representative or power of attorney;
- 4) when we receive your prior consent (i.e., through meetings, including the use of note-taking tools);
- 5) in connection with a proposed or actual sale, merger, or transfer of all or a portion of our business; and
- 6) as otherwise permitted to do so in accordance with the parameters of applicable federal and/or state privacy regulations.





#### **Business Continuity**

We have adopted a Business Continuity Plan that outlines the strategies and plans that will be used by Infinity during a significant business disruption, including loss of Infinity's key principal. In the event of death or incapacitation of the key personnel of Infinity, Infinity has designated individual(s) to promptly notify clients of the death or incapacity of Infinity's principal in order for client's to expeditiously make any necessary changes to their investment account(s) and/or financial plan.

Otherwise, Infinity will not disclose any personal information about you or your account(s) unless one of the following conditions is met:

- We receive your prior written consent; or
- We have documentation that the recipient is your authorized representative; or
- We are required by law to disclose information to the recipient

Arrangements with companies not affiliated with Infinity will be subject to confidentiality agreements.

### **How We Protect Your Personal Information**

Privacy has always been important to Infinity. We restrict and limit access to client information only to those who need to carry out their business functions. We maintain physical, electronic, and procedural safeguards to protect your confidential personal information.

## **Former Clients**

Even if we cease to provide you with financial services, our Privacy Policy will continue to apply to you, and we will continue to treat your nonpublic information with strict confidentiality. We maintain all records regarding all former clients for the retention period required by law.

## Contact Us

Clients are encouraged to discuss any questions regarding privacy policies and procedures directly with Kelly Ennis, President and Chief Compliance Officer of Infinity. Please contact Kelly at 860-264-5831.

### Client Opt-In

It is deemed a dishonest and unethical business practice for an investment adviser to: "[disclose] the identity, affairs or investments of any client to any third party unless required by law to do so, or unless consented to by the client".

The current regulation prohibits the state registered investment adviser from sharing non-public personal information with non-affiliated third parties unless the customer specifically consents to the disclosure. As such, Infinity requires clients to opt-in to sharing their nonpublic information with non-affiliated third parties & service providers, as deemed appropriate, by signing below.

Client's Signature	Date	Client's Signature (if applicable)	Date