

FIRST FINANCIAL COACHING, INC. – A REGISTERED INVESTMENT ADVISOR

Privacy Practices Notice

First Financial Coaching, Inc. (FFC) is committed to protecting your privacy. In order to provide high quality financial services and products from affiliated companies, we collect personal information about you where required by applicable laws set forth by regulatory organizations in the financial services and insurance industry. **We do not sell the information you have entrusted to us to third parties**, and we disclose your personal information to such regulatory organizations or affiliated companies only as necessary to provide the products and services you expect from a personal financial services organization. This notice describes our current privacy policy and practices. During your relationship with FFC and its employees, agents, and representatives, we will advise you of our privacy policy and practices at least once annually, as required by law; however, we will continue to protect your personal information even after the relationship ends. **You do not need to take any action as a result of this notice, but you do have certain rights as described below.**

INFORMATION WE MAY COLLECT AND USE

We collect information about you, which we may share now or in the future. We do this to help us identify you as our existing client, a former client, or as a prospective client or visitor to our electronic mediums to process your financial transactions, requests for information, to quickly provide financial services to you, or tell you about products or services we believe you may want and use. Information we collect includes:

- **Information from you** - when submitting your applications, new account documentation for purchases, or requesting an insurance quote, you may give us information such as your name, address, Social Security number, financial, health and employment history.
- **Information about your transactions** - we may keep information about your transactions with us or our affiliated companies, for example, the products you purchase from us, the amount you paid for products or services, your account balances, or payment history.
- **Information from outside our company or affiliated companies** - we may also initiate the collection of other information by one of our affiliated companies associated with the purchase of products and services. This may include information from consumer reporting agencies such as your credit history, credit scores, driving or employment records and may also include information from other individuals or businesses, such as medical and demographic information.
- **Information from our websites** - we may obtain information about you from on-line forms, site visitor-ship data and on-line information collecting devices commonly called "cookies".

HOW WE TREAT YOUR INFORMATION

First Financial Coaching, Inc. may share the information described above with our affiliated service providers. These providers may require access to information about you to process or service transactions you have requested, to provide efficient customer services, or to inform you of products or services you may find useful. These providers may be affiliated or unaffiliated with First Financial Coaching, Inc. or its affiliated companies, and may include financial service providers (for example, third party administrators, broker-dealers, companies that perform marketing services on behalf of FFC, reinsurers, other financial institutions with whom there are joint marketing agreements) or non-financial companies and individuals (for example, consultants, vendors, and the Medical Information Bureau).

Please be assured that we require these service providers to safeguard your personal information and to use or disclose it only for the work they are performing on our behalf, or as permitted by law.

When you apply for various kinds of insurance products with our affiliated companies, they may share information about your application with credit bureaus. We also may provide information to regulatory authorities and law enforcement officials in accordance with applicable law or to others when we believe in good faith that the law requires it. **Unlike many other financial institutions and personal financial services firms, FFC does not sell or share your information with**

Privacy Practices Notice – Continued

marketers of outside companies who may want to offer you their own products and services. Neither is information shared that is received about you from a consumer-reporting agency. You do not need to take any action for this benefit.

SECURITY OF INFORMATION

Keeping your information secure is one of our most important responsibilities. We maintain physical, electronic and procedural safeguards to protect your information. Employees are authorized to access your information only when they need it to provide you with products and services or to maintain your accounts.

CONFIDENTIALITY OF MEDICAL INFORMATION

We understand that you may be especially concerned about the privacy of your medical information. In the course of business when dealing with applications for various insurance products, we want to assure you that we do not sell or rent to anyone your personally identifiable medical information, nor do we disclose it to others for marketing purposes. We only use and share personally identifiable medical information for purposes of underwriting insurance, assisting in the administering your policy or claim, and other purposes permitted by law, such as disclosures to insurance regulatory authorities, or in response to legal process.

MAKING SURE INFORMATION IS ACCURATE

We want to make sure that we have accurate information about you. Upon written request, we will make your personal information available for your review within thirty (30) business days. Information we have collected in connection with or in anticipation of a claim or legal proceeding will not be made available. If you believe that any of our records are inaccurate, you may notify us in writing of any corrections, amendments or deletions that you believe should be made. We will respond to your request within thirty (30) business days. Information should be directed to the address you normally use for your correspondence with us. For inquiries contact us at: First Financial Coaching, Inc., Attn: Privacy Inquiry, 144 South Main Street, Mt. Clemens, MI 48043.

You also have the right as a consumer to “opt out” of information that may be shared between FFC and its agents or advisors that represent FFC in the capacity of Investment Advisor Representatives in dealing with your current or historical financial and personal information. Per your request, your personal and/or financial information will not be shared with FFC agents or representatives, or with specific institutions that may be affiliated with FFC in the normal course of business.

To opt out of information sharing, please contact First Financial Coaching, Inc. Attn: Opt Out Request, 144 South Main Street, Mt. Clemens, MI 48043. Please specify the named individuals you wish your information not to be shared with, please list the companies you wish your information not to be shared with. A copy of the Opt Out notification to these contacts will be provided to you after notifications are completed.

This Notice applies for the following First Financial Coaching, Inc. affiliated companies:

First Financial Services of Michigan
Furest Furest Services, Inc.