Website Privacy Policy
FrancisFinancial.com

Effective Date: August 11, 2015

We value your privacy, and we want to help make your experience with us at Francis Financial, Inc. ("the Firm") as satisfying and safe as possible.

We have established this Website Privacy Policy to explain how we receive, use, and share information you may provide in connection with your access to our www.FrancisFinancial.com website (the "Site"). Should you become a client of the Firm, we will provide you with a separate Client Privacy Policy, which governs the personal information and records you share with us in that context.

Your Acknowledgement. The Site is intended for use only by individuals over the age of 18 who are accessing the Site from inside the United States. By using the Site or submitting any information to us, you acknowledge that you are over the age of 18, are in the United States, and that you consent to our use and sharing of information collected or submitted as described in this Privacy Policy. This Privacy Policy is incorporated into and is subject to the Site's Terms of Use. By using the Site, you expressly consent to the terms of this Privacy Policy and the information handling practices described herein.

Types Of Information We Collect. In connection with your use of this Site, we may collect both personally identifiable information ("PII") and non-personally identifiable information ("Non-PII"). PII includes information such as your name, address, phone number, zip code, email address, and similar information. Non-PII is non-personally identifiable information, and may include, for example, your IP address, browser type, domain names, access dates and similar information. (PII and Non-PII will be collectively referred to as "Information").

Collection of Information. We may collect information from you through your voluntary submission to receive offers from the Site, to access certain resources on the Site, or to request information from the Firm. We also may collect information from your browser when you use the Site, using a variety of methods. The information that we with these automated methods may include, for example, your IP address, cookie information, a unique device or user ID, browser type, system type, the content and pages that you access on the Site, and the "referring URL" (i.e., the page from which you navigated to the Site). Websites visited before visiting the Site might place Information within the URL of your browser during a visit to that previous website. We may unintentionally collect that information as part of referring URL information. We may also use cookies on the Site to recognize you and to store references to you and session validators on your hard drive. We may use passively-collected information to administer, operate, and improve the Site and our other services and systems, and to provide services and content that are tailored to you. We may combine non-PII with PII.

If we directly combine any Non-PII with PII, we treat the combined information as PII under this Privacy Policy. Otherwise, we use information collected by passive means in aggregated or other non-personally identifiable forms.

Use And Sharing Of Information. We may use the information you provide to us for any purpose, including but not limited to: (1) to provide you with materials that you have requested, (2) to contact you for the potential engagement for the Firm's financial planning services, (3) to personalize our contact with you, (4) to operate, provide, improve, and maintain the Site, (5) developing new products and services, (6) to prevent abusive and fraudulent use of the Site, (7) to send you administrative messages, content, and other services and features in which we believe you may be interested; and for any other administrative and internal business purposes permitted by law.

We may share your information with services providers of the Firm and/or with third parties that assist us in operating our business and servicing our clients. We may also disclose your information if, in good faith, it is believed that doing so is required by a subpoena or other judicial or administrative order or otherwise required by law. Additionally, we may disclose information if, in good faith, we deem it appropriate or necessary to prevent violation of the Site's Terms of Use or our other agreements; take precautions against liability; protect our rights, property, or safety, or of any individual, or the general public; maintain and protect the security and integrity of our services or infrastructure; protect ourselves and our services from fraudulent, abusive, or unlawful uses; investigate and defend ourselves against third-party claims or allegations; or assist government enforcement agencies.

Permission To Contact You And Your Right To Opt Out Of Further Contact. Your provision of information to us through the Site will be considered a grant of permission for us to contact you through any means provided (including but not limited to mail, phone, text message, and/or fax). You have the right to opt-out of further promotional contact from us. If at any time you desire to be removed from an email mailing list, please send your request by email to Sunaina@francisfinancial.com [CODE SUBJECT LINE AS "PRIVACY POLICY—OPT-OUT FROM PROMOTIONS] or by first class mail to Francis Financial, Inc., 39 Broadway, Suite 1730, New York, NY 10006, Attn: Privacy Matters. Please be aware that this opt-out only applies to future messages and that we may still send you messages for administrative purposes as permitted by law.

Protection Of Your Information/eMoneyAdvisor Platform. Whenever we handle your personal information, we take steps to ensure that your information is treated securely and in accordance with our current Terms of Use and this Privacy Policy. We do not store any PII on www.FrancisFinancial.com and do not accept payments for services through the Site.

Clients have the option to upload secured documents and information to the Firm's Private Wealth Platform, which is provided through a gateway owned by eMoneyAdvisor, LLC. eMoneyAdvisor (also "eMoney") takes the following precautions concerning the security of information uploaded to its portal (https://wealth.emaplan.com/ema/Legal/Security):

> **Firewalls** – All eMoney Advisor equipment and applications are secured behind firewalls. Firewalls are security devices that create a barrier between the wide-open Internet and the equipment and applications used by eMoney Advisor. Firewalls limit ways that can inflict harm on data, equipment or applications. All traffic detected to and from eMoney's system must pass through these firewalls, including access from the eMoney Advisor intranet. The firewalls are also used to separate databases containing your data from eMoney's web and application servers.
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> **Intrusion Detection -** The entire production network is monitored and policed for intrusion attempts 24 hours a day, 7 days a week. Any detected intrusion attempts are analyzed to determine the identity of the intruders and the extent of the intrusion.
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> **Password Protection and Data Security -** Every user's password and account data are stored and transmitted in an encrypted format at all times across multiple,

distributed database systems, all securely housed at a state of the art third party hosting service that provides enhanced physical security, fire protection and electronic shielding. No one but the user has access to such user's password.

Audits and Inspections - The eMoney Advisor security infrastructure is regularly audited and inspected to ensure the security tools utilized are up to date.

Physical Security - eMoney Advisor provides its service from a secure environment operated by a third-party hosting service. Security personnel monitor the system 24 hours a day. Access to servers requires multiple levels of authentication, including biometrics (finger print scanning) procedures to enter the production hosting facility. eMoney Advisor restricts physical access to its equipment to a very select group of authorized personnel only.

You may refer to eMoney Advisor's own website for more information about their privacy policy and terms of service.

If the Firm becomes aware of a security breach, we may attempt to notify you electronically so that you can take appropriate protective steps. By using the Site or providing information to us, you agree that we can communicate with you electronically regarding security, privacy, and administrative issues relating to your use of the Site. If you believe that there has been a breach of the Site's security, please contact us at (212) 374-9008.

Additional Client Privacy Policies

At Francis Financial, Inc., an independent, fee-only financial planning firm, we want to let you know where we stand on a crucial topic: customer information and privacy. Should you become an actual client of the Firm, please know we are committed to safeguarding the confidential information of each of our clients. We hold all personal information provided to our Firm in the strictest confidence. These records include all personal information that we collect from you in connection with any of the services provided by the Firm. We have never disclosed information to nonaffiliated third parties, except as may described in our Privacy Policy or as permitted by law, and do not anticipate doing so in the future. If we were to anticipate such a change in firm policy, we would be prohibited under the law from doing so without advising you first.

As you know, we use health and financial information that you provide to us to help you meet your personal financial goals, while guarding against any real or perceived infringements of your rights of privacy. We deal with client personal information as follows.

- We limit employee and agent access to information only to those who have a business or professional reason for knowing, and only to nonaffiliated parties as permitted by law.
- We maintain a secure office and computer environment to ensure that your information is not placed at unreasonable risk.
- The categories of nonpublic personal information that we collect from a client depend upon the scope of the client engagement. It will include information about your personal finances and information about your health to the extent that it is needed for the planning process.
- For unaffiliated third parties that require access to your personal information, including financial service companies, consultants, and auditors, we also require strict confidentiality in our agreements with them and expect them to keep this information private. Federal and state regulators also may review firm records as permitted under law.
- We do not provide your personally identifiable information to mailing-list vendors or solicitors for any purpose.
- We will maintain personally identifiable information about you 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.

The Firm may share your personally identifiable information with the Certified Financial Planner Board of Standards Inc. (CFP Board) as part of complying with the CFP Board's Code of Ethics and Professional Responsibility. The firm may share information with the CFP Board during a potential CFP Board investigation to expedite the process for all parties. If you prefer that we do not disclose your nonpublic personal information to the CFP Board, simply opt out of this disclosure by sending an e-mail to Sunaina@FrancisFinancial.com [CODE SUBJECT LINE: OPT-OUT FROM CFP BOARD DISCLOSURES].

Updates to This Privacy Policy. We may update or amend this Privacy Policy at any time. No prior notice of any update or amendment is required, and all updates or amendments are effective upon being posted. We encourage you to periodically review this Privacy Policy to stay informed about our collection, use, and disclosure of Information on the Site. Your continued use of the Site constitutes your agreement to this Privacy Policy and any updates. If you do not agree with the terms of this Privacy Policy, please do not use or access the Site.

Contacting Us. If you have any questions about our privacy policy or wish to review or revise the personally identifiable information that we have collected about you, you may send a written request to: Francis Financial, Inc., 39 Broadway, Suite 1730, New York, NY 10006, Attn: Privacy Matters.