Lemma Financial

POLICY

Privacy Policy

Lemma Financial LLC ("LF") 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. We want our clients to understand what information we collect, how we use it, and how we protect your personal information.

Why we collect your information

We gather information about you so that we can:

- Help design and implement the investment and financial 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" about you:

- Information from our initial meeting or subsequent consultations about your identity, such as your name, contact information, social security number, date of birth, and financial information;
- Information that we generate to service your financial needs; and
- Information that we may receive from third parties in connection with the services we provide you.

What information we disclose

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

1. to individuals and/or entities not affiliated with LF, including, but not limited to third-parties that assist in the supervision or management of your account(s) (i.e., sub-advisers, account custodian, record keeper, attorney, etc.);

2. to service providers contracted by us in order for us to perform the duties in furtherance of the client's engagement with LF (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;
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.

We will not sell your personal information. No contact information, including phone numbers and email addresses, will be shared with third parties or affiliates for marketing or promotional purposes. In the event that LF has a change to its client privacy policy that would allow it to disclose nonpublic personal information not covered under applicable law, LF will allow its clients the opportunity to opt-out of such disclosure.

How we protect your personal information

We restrict and limit access to client information only to those who need to carry out their business functions. We safeguard client information by preventing its unauthorized access, disclosure, or use. We maintain physical, electronic, and procedural safeguards to protect your confidential personal information. Arrangements with companies or independent contractors not affiliated with LF will be subject to confidentiality agreements.

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 personal information with strict confidentiality. We maintain all records regarding all former clients for the retention period required by law.

Questions

Clients are encouraged to discuss any questions regarding privacy policies and procedures directly with Matthew Boutrelle, Chief Compliance Officer of LF. Please contact Matthew Boutrelle at (805) 704-1199.