**Retirement Planners of America Privacy Policy**

*Effective June 30, 2020*

The Retirement Planners of America Management, LLC (“RPOA”, “we”, or “our”) views protecting private information regarding its clients and potential clients as a top priority. Pursuant to the requirements of the Gramm-Leach-Bliley Act (the "GLBA") and guidelines established by the Securities Exchange Commission regarding the Privacy of Consumer Financial Information (Regulation S-P) and the ***EU General Data Protection Regulation (“GDPR”)***, RPOA has instituted the following policies and procedures in an effort to ensure that such nonpublic private information (also known as, “Personal Data”) is kept private and secure. This policy is applicable to natural persons including clients, prospective clients and beneficiaries for which we collect Personal Data. This policy also outlines what Personal Data RPOA and its Associated Persons are allowed to collect and use in connection with its advisory activities.

This Privacy Notice discloses our information collection and sharing practices and other required information. The notice will be revised as necessary and any time our privacy or information security practices change. Additionally, pursuant to the GDPR***,*** the Privacy Notice must be presented in a form that is concise, clear and easily accessible and in plain language and state the statutory rights available to our clients.

Also, this Privacy Notice may be amended from time to time in order to keep it up to date with applicable legal requirements and the way we conduct our business. If we make significant changes to this Privacy Policy, we will inform you by email.

**Responsibility**

The CCO is responsible for safeguarding and protecting the nonpublic Personal Data of clients collected by us, and to ensure that our client’s nonpublic Personal Data is shared only with Associated Persons and others in a way that is consistent with the RPOA's Privacy Policy and applicable legal requirements.

How and What Type of Personal Data We Collect

To conduct regular business, RPOA, Inc. may collect Personal Data from sources such as:

* Personal Data reported by the client on applications or other forms the client provides to the firm
* Personal Data about the client’s transactions implemented by the firm or others
* Personal Data developed as part of financial plans, analyses or investment advisory services
* Personal Data collected on our Site such as cookies.

To administer, manage, service, and provide related services for client accounts, it is necessary for RPOA to provide access to customer information to certain persons within the firm and to nonaffiliated companies, with whom the firm has entered into agreements with. To provide the utmost service, the firm may disclose the information below regarding customers and former customers, as necessary, to companies to perform certain services on the firm’s behalf.

* Information RPOA receives from the client on applications (name, social security number, address, assets, and beneficiary’s name, social security number, date of birth, etc.), from third parties authorized to share your information with us, from Cookies, or from publicly available information
* Unique device identifiers for advertising (Google Advertiser ID or IDFA, for example).
* Information about the client’s transactions with the firm or others (account information, payment history, parties to transactions, etc.)
* Information concerning investment advisory account transactions
* Information about a client’s financial products and services transaction with RPOA

In addition to the above, other specific types of Personal Data RPOA collects includes, but is not limited to: birthdate, bank account number(s), tax identification number, other government-issued identification numbers; other forms and documents client sends to RPOA, information to create client’s online account. Complete details on each type of Personal Data collected are provided in the dedicated sections of this Privacy Notice or by specific explanation text displayed prior to the data collection.

Personal Data may be freely provided by the client, or in the case of Usage Data, collected automatically when using this Website. Unless specified otherwise, all Personal Data requested by Website is mandatory and failure to provide this Personal Data may make it impossible for this Website to provide its services.

Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the Data collection.

How We Use Your Personal Data

RPOA will only use your Personal Data for the purpose of providing investment advisory services to you, including, but not limited to: (1) to monitor, audit, evaluate and otherwise administer our services; (2) to communicate with you; (3) in an effort to protect against fraud and identity theft; (4) comply with applicable legal requirements, relevant industry standards, contractual obligations, and our policies and terms; and (5) for other purposes as required or authorized by law, including other purposes for which you have provided your consent and our legitimate interests.

RPOA takes appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data. The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to RPOA, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of this Website (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors. The updated list of these parties may be requested from the Owner at any time.

Lawful Basis to Process Your Personal Data

To lawfully process your Personal Data, RPOA asserts one or more of the following lawful bases: (1) your voluntary consent in connection to providing you with RPOA’s investment services; (2) as necessary in order to fulfill certain contractual obligations; (3) as necessary to comply with applicable rules, laws, and regulations; and (4) as necessary in connection to the legitimate interests of our firm and/or a third party.

Your Rights and Limits on Sharing

In terms of your rights, to the extent permitted by applicable law, you may request: (1) to have your Personal Data corrected; (2) to opt out of receiving marketing communications at any time; (3) to file a complaint with an applicable government regulator; (4) to access the Personal Data RPOA holds about you; (5) to restrict or object to the processing of your Personal Data, or request that your Personal Data is erased; (6) to receive a copy of the Personal Data you have provided to RPOA, in a structured, commonly used format (known as “data portability”); (7) have a copy of your Personal Data provided to you or another controller where technically feasible; (8) to withdraw your consent to Personal Data that you provided to us voluntarily, or otherwise consented to its use.

To the extent U.S. Federal laws apply to your Personal Data, you have the right to limit only: (i) sharing for affiliates’ everyday business purposes; (ii) affiliates from using your Personal Data to market to you; and (iii) sharing for nonaffiliates to market to you. U.S. state laws and individual companies may give you additional rights to limit sharing.

RPOA may share your Personal Data for its everyday business purposes such as maintaining your account(s) or responding to court orders and legal investigations. For these types of purposes, you cannot limit sharing. Moreover, RPOA does not share your Personal Data with “nonaffiliated” companies for marketing purposes or for “joint marketing” purposes as those terms are defined under applicable U.S. Federal law.

As discussed above, we will endeavor to ensure your Personal Data is kept accurate, complete, up to date and relevant. Please let us know if any of your details change. If you feel your Personal Data is not accurate, complete or up to date, please notify us and we will take reasonable steps to ensure it is corrected. Additionally, you have the right to know what kind of information we collect and retain about you, to have reasonable access to it and to request a copy of it. You can contact us to request this information using the details listed below.

In accordance with the foregoing, RPOA may take steps to verify your identity before granting you access to your Personal Data.

How We May Share Your Personal Data with Third Parties

The Company may share information with affiliated parties and shall inform clients, in its privacy notice, of the type of information shared and the category of parties with whom such information is shared.

From time to time, we may have relationships with nonaffiliated third parties (such as attorneys, auditors, accountants, brokers, custodians, and other consultants), who, in the ordinary course of providing their services to us, may require access to information containing nonpublic Personal Data. These third party service providers are necessary for us to provide our investment advisory services. When we are not comfortable that service providers (e.g., attorneys, auditors, and other financial institutions) are already bound by duties of confidentiality, we require assurances from those service providers that they will maintain the confidentiality of nonpublic Personal Data they obtain from or through us. In addition, we select and retain service providers that we believe are capable of maintaining appropriate safeguards for nonpublic information, and we will require contractual agreements from our service providers that they will implement and maintain such safeguards. For service providers subject to GDPR, we will ensure that the appropriate data processing agreements are in place.

How Long We Retain Your Personal Data

To the extent permitted by applicable law, RPOA retains your Personal Data for the period necessary to serve the purposes for which RPOA obtained it. RPOA may also retain your Personal Data beyond such period in accordance with applicable laws, regulations, or another lawful basis, including but not limited to, compliance with our contractual obligations, legal obligations, regulatory obligations, legal claims, or another legitimate interest.

RPOA may retain Personal Data for a longer period only when you have given consent and as long as such consent is not withdrawn.

How We Maintain Accuracy of Your Personal Data

RPOA will endeavor to ensure your Personal Data is kept accurate, complete, up to date and relevant. Please let RPOA know if any of your details change. If you feel your Personal Data is not accurate, complete or up to date, please notify us and we will take reasonable steps to ensure it is corrected. You can contact us using the details listed below.

**Rights Provided By the EU General Data Protection Regulation**

Pursuant to GDPR and subject to certain exemptions, and in some cases dependent upon the processing activity we are undertaking, the client may have the following rights in relation to his/her Personal Data:

* Right to Access Personal Data
* Right to Rectify or Erase Personal Data
* Right to Restrict the Processing of Personal Data
* Right to Transfer Personal Data
* Right to Object to the Processing of Personal Data
* Right to Object to How We Use Personal Data for Direct Marketing Purposes
* Right to Obtain a Copy of Personal Data Safeguards Used for Transfers Outside Jurisdiction
* Right to Make a Complaint with a Local Supervisory Authority

We may need to ask the client for additional information to confirm the client’s identity and for security purposes, before disclosing the Personal Data requested him/her.

The client may exercise his/her rights by contacting us. Subject to legal and other permissible considerations, we will use reasonable efforts to honor the client’s request promptly or inform them if we require further information in order to fulfil his/her request.

We may not always be able to fully address the client’s request, for example if it would impact the duty of confidentiality we owe to others, or if we are legally entitled to deal with the request in a specific way.

**Right to Access Personal Data**  
  
The client has a right to request that we provide him/her with a copy of the Personal Data that we hold and also has the right to be informed of: (a) the source of the Personal Data; (b) the purposes, legal basis and methods of processing; (c) the data controller’s identity; and (d) the entities or categories of entities to whom the Personal Data may be transferred.

**Right to Rectify or Erase Personal Data**

The client has a right to request that we rectify inaccurate Personal Data. We may seek to verify the accuracy of the Personal Data before rectifying it.

The client may also request that we erase Personal Data in limited circumstances where:

* it is no longer needed for the purposes for which it was collected; or
* the client has withdrawn his/her consent (where the data processing was based on consent); or
* following a successful right to object (see right to object); or
* it has been processed unlawfully; or
* to comply with a legal obligation to which RPOA is subject.

We are not required to comply with the client’s request to erase Personal Data if processing the Personal Data is necessary:

* for compliance with a legal and regulatory obligation; or
* for the establishment, exercise or defense of legal claims.

**Right to Restrict the Processing of Personal Data**  
  
The client may ask us to restrict Personal Data, but only where:

* its accuracy is contested and to subsequently allow us to verify its accuracy; or
* it is no longer needed for the purposes for which it was collected, but we still need it to establish, exercise or defend legal claims; or
* the client has exercised the right to object, and we are considering his/her request.

We can continue to use Personal Data following a request for restriction:

* where we have the client’s consent; or
* to establish, exercise or defend legal claims; or
* to protect the rights of another natural or legal person.

**Right to Transfer Personal Data**

The client may ask us to provide his/her Personal Data in a structured, commonly used, machine-readable format, or to have it transferred directly to another data controller, but in each case only where:

* the processing is based on the client’s consent or on the performance of a contract with the client; and
* the processing is carried out by automated means.

**Right to Object to the Processing of Personal Data**

The client may object to any processing of his/her Personal Data which has our legitimate interests as its legal basis, if the client believe his/her fundamental rights and freedoms outweigh our legitimate interests.  
  
If the client raises an objection, we have an opportunity to demonstrate that we have compelling legitimate interests which override the client’s rights and freedoms.

**Right to Object to How We Use Personal Data for Direct Marketing Purposes**

The client may request that we change the manner in which we contact them for marketing purposes.  
  
The client may request that we do not transfer his/her Personal Data to unaffiliated third parties for the purposes of direct marketing or any other purposes.

**Right to Obtain a Copy of Personal Data Safeguards Used for Transfers Outside The Client’s Jurisdiction**

The client may ask to obtain a copy of, or reference to, the safeguards under which his/her Personal Data is transferred outside of the European Union.

We may need to redact data agreements to protect commercial terms.

**Right to Lodge a Complaint With Local Supervisory Authority**

The client has a right to lodge a complaint with our [local data protection supervisory authority](http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080) if he/she has concerns about how we are processing his/her Personal Data. We should, however, encourage the client to contact us first.

Data Controller

To the extent GDPR applies, RPOA is the Data Controller for this policy located at the address below.

Former Clients

Even if we cease to provide you with financial products or services, our Privacy Policy will continue to apply to you and we will continue to treat your nonpublic information with strict confidentiality.

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## Children

Our Site is not directed to children under the age of 18 years. By using our Site, you represent and warrant that you are at least 18 years old.

We respect the privacy of your children and do not knowingly collect or retain personally identifiable information or “Personal Data” from children under the age of 18 through this web site. However, we may process personal data, on a child’s behalf, with permission from the parent or guardian.

To the extent we have unintentionally collected any Personal Data on our Site from a person under the age of 18 years old, you may request and obtain removal of this Personal Data. To make such a request, please send an email with a detailed description of the specific content or information to the e-mail address above.

Please be aware that such a request does not ensure complete or comprehensive removal of the content or information you have posted and that there may be circumstances in which the law does not require or allow removal even if requested.

1. **Changes to This Privacy Notice**

RPOA reserves the right to make changes to this Privacy Notice at any time by notifying its Users on this page and possibly within this Website and/or - as far as technically and legally feasible - sending a notice to Users via any contact information available to RPOA. It is strongly recommended to check this page often, referring to the date of the last modification listed at the top of this page.  
  
Should the changes affect processing activities performed on the basis of the User’s consent, RPOA shall collect new consent from the User, where required.

**Notice to California Clients Required by State Law**

California residents, please click [here](https://retirementplannersofamerica.com/ccpa-privacy-policy/) to learn about your rights under the California Consumer Privacy Act.

Contact Us

Should you have any questions regarding the above, please contact:

1. **Data Controller**

Retirement Planners of America  
2820 Dallas Parkway  
Plano, Texas 75093

Data Controller contact email: [Bill@rpoa.com](mailto:Bill@rpoa.com)

Website Appendix

## Security

As our Website is linked to the internet, and the internet is inherently insecure, we cannot provide any assurance regarding the security of transmission of Personal Data you communicate to us online. We also cannot guarantee that the Personal Data you supply will not be intercepted while being transmitted over the internet. Accordingly, any Personal Data or other information which you transmit to us online is transmitted at your own risk.

## Links to Third-Party Websites

As a convenience to you, RPOA may provide hyperlinks to websites operated by third parties. When you select these hyperlinks, you will be leaving our Website.

RPOA has no control over third party websites, their content, or security. Accordingly, when you access these third-party websites it is at your own risk. We encourage you to read the associated privacy policies by such third-party websites to learn more about their data privacy management practices. RPOA may, in its sole discretion, block links to our Website without prior notice.

## Cookies

We may use “cookies” to help us tailor our Website to better suit your needs (for example, we may use cookies to enable us to save any personal preferences indicated by you) and to provide a more effective route to various components of our Website.

For more information on how our firm utilizes cookies and how you may disable them, please refer to our [Cookie Policy](https://retirementplannersofamerica.com/gdpr-cookie-policy/).

## Do We Respond to Do Not Track Signals?

Do Not Track (“DNT”) is a privacy preference that Users can set in certain web browsers and is a way for users to inform websites and services that they do not want certain information about their webpage visits collected over time and across sites or online services.

We do not track users across time or over multiple websites, we do not receive, or respond to, browser do-not-track signals or other similar mechanisms. However, some third party sites do keep track of your browsing activities when they serve you content, which enables them to tailor what they present to you. To determine whether any of the third-party services it uses honor the “Do Not Track” requests, please read their privacy policies.

To learn more about setting up a Do Not Track signal, please visit <https://allaboutdnt.com/>.