



# ZRC WEALTH MANAGEMENT

WALNUT CREEK • SANTA ROSA

## Privacy Policy

ZRC Wealth Management, LLC, a registered investment advisor, is committed to safeguarding the confidential information of its 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 about any of the services provided by ZRC Wealth Management. We will never disclose information to nonaffiliated third parties, except as permitted by law, and will not do so without consulting with you first. As you know, we use 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. Our policy with respect to personal information about you is listed below.

- 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. For example, federal regulations permit us to share a limited amount of information about you with a brokerage firm to execute securities transactions on your behalf.
- 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, information about your health to the extent that it is needed for the planning process, information about transactions between you and third parties, and information from consumer reporting agencies.
- 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.
- Personally identifiable information about you will be maintained 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.
- With your prior consent, we will provide nonpublic personal information to others on your wealth management team (such as your CPA or tax preparer, attorney, banker/lender, insurance agent, etc.).
- The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our client experience, you are responsible for keeping this password confidential. We ask you not share your password with anyone and use “two-step verification” whenever possible.

- Our primary custodian of client accounts and broker/ dealer, Charles Schwab & Co., has similarly taken extensive steps to safeguard client information. In an effort to prevent fraud, Charles Schwab & Co. often requires written and/or oral authorization from the client before processing transactions and “move money” instructions. Though ZRC Wealth Management usually has Limited Power of Attorney to authorize such transactions, we may also require verbal confirmation with the client and reserve the right to the delay or hold-up any such transaction in the process of confirming the client’s identity and instructions. It is the client’s responsibility to give ZRC adequate advance notice of such transactions as ZRC will not be held responsible for delays that may result for authenticating the client’s identity or instructions. To learn more about how Schwab safeguards client information click here [http://content.schwab.com/learningcenter/safeguard\\_online\\_information.html](http://content.schwab.com/learningcenter/safeguard_online_information.html)

## Privacy Online

We consider privacy, security, and service in our online operations to be just as critical as in the rest of our business. We therefore employ all the safeguards described above, along with the following Internet-specific practices.

We use a variety of proven protections to maintain the security of your online sessions. For example, we make extensive use of firewall barriers, encryption techniques and authentication procedures. We may also use “cookies” and similar files that may be placed on your computer’s hard drive for security purposes, to facilitate site navigation, and to personalize your experience on our site.

When you visit our website, we may collect technical and navigational information, such as computer browser type, Internet protocol address, pages visited, and average time spent on our website. This information may be used, for example, to alert you to software compatibility issues; or it may be analyzed to improve our web design and functionality.

When you visit password-protected areas of our website, we will require you to enter your individual login ID and password. In such cases, your browsing will no longer be anonymous to us. However, we will use your personal information only to provide you with account information or otherwise as listed above.

While we take active steps to protect all information, we receive online, we cannot guarantee the security of any information you transmit to us via the Internet. Emails you send us are not necessarily secure when they are transmitted to us. Therefore, if your communication is very sensitive or includes highly confidential information such as a social security number or an account number, it may be prudent for you to use a method of transmission other than email or otherwise encrypt such information (for example, by uploading to your secure ZRC Wealth portal or by sending to a member of ZRC using the secure link in our email signatures provided by Citrix Files).

At ZRC Wealth Management, client privacy and safeguarding personal information is of the utmost importance to us. We utilize industry leading policies, procedures, and technology to stay at the forefront of cyber security. Our specific policies and procedures are available upon request.

**Barry N. Mendelson, CFP®**  
Chief Compliance Officer  
[barry@zrcwm.com](mailto:barry@zrcwm.com)