

# **Privacy Policy & Identity Theft Prevention Program**

**Orcam Financial Group LLC**

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# Table of Contents

Table of Contents.....	2
1. Introduction .....	3
2. Our Commitment to You.....	3
3. Definitions.....	4
4. Non-Public Personal Information Collected.....	4
5. Nonpublic Personal Information Disclosed to Affiliates and Nonaffiliated Third Parties.....	5
6. Former Customers .....	5
7. When You Can Limit Sharing.....	5
8. Confidentiality and Security of Nonpublic Personal Information .....	5
9. Maintenance of Records .....	6
10. Notice to Clients.....	6
11. Opting Out.....	6
12. Requests for Information.....	7

## **1. Introduction**

An important part of the relationship we have with our Clients is the information you share with us. Protecting your privacy is important to us and we want you to know how we treat your private information.

Pursuant to Title V of the Gramm-Leach-Bliley Act and United States Securities and Exchange Commission ("SEC") Regulation S-P (17 CFR 248.1 – 248.30), this document explains the Privacy Policy of Orcam Financial Group LLC concerning the privacy interests of our Clients. Orcam Financial Group LLC is a Delaware corporation with its office in San Diego, California. Orcam Financial Group LLC is an investment adviser registered with the SEC. Orcam Financial Group LLC's principal business is to act as an investment adviser in accordance with all laws, rules and regulations applicable to investment advisers and the business conducted by investment advisers. As an investment adviser, Orcam Financial Group LLC's principal business is to provide investment advisory and subscription services to Clients.

The policy of Orcam Financial Group LLC is to protect the confidentiality, integrity and security of any non-public personal information of its clients and prospective clients and to prevent unauthorized access to, or the use or disclosure of such information. In its capacity as an investment adviser, investment manager, and in conducting its advisory business, Orcam Financial Group LLC receives and/or comes into contact with certain nonpublic personal information concerning its current and/or former customers, including but not limited to certain nonpublic personal information related to the securities account(s) that customers open and/or maintain with broker dealers and/or the bank accounts the customers maintain for themselves and possibly others. Any and all such nonpublic personal information related to customers and/or customers' securities and bank account(s) is hereinafter referred to as "nonpublic personal information." Orcam Financial Group LLC receives and/or comes into contact with the nonpublic personal information only for purposes of conducting its business as described above. For convenience, "you" or "your" refers to any and all Client(s) described above and "we", "our" and "us" refers to Orcam Financial Group LLC throughout this document.

## **2. Our Commitment to You**

We are committed to safeguarding the use of your personal information that we have as your Investment Advisor. We protect the security and confidentiality of the personal information we have and make efforts to ensure that such information is used for proper business purposes in connection with the management or servicing of your account. Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything we can to maintain that trust.

We do not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and proper business purposes in connection with the servicing and management of your account as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this privacy policy.

### 3. Definitions

- **Affiliates**  
Companies related by common ownership or control. They can be financial and non- financial companies. We do not share with any affiliates except for Linkage.
- **Non-affiliates**  
Companies not related by common ownership or control. They can be financial and nonfinancial companies. We do not share with non-affiliates except as describe in this notice.
- **Joint Marketing**  
A formal agreement between non-affiliated financial companies that together market financial products or services to you. We do not engage in joint marketing.

### 4. Non-Public Personal Information Collected

In conducting its business as described above, we collect (or may collect), for example, the following types of nonpublic personal information:

- Information we receive from you such as:
  - Information you provide in connection with any securities account, margin loan, debit card or any other financial product or service, whether in writing, in person, by telephone, electronically or by any other means, such as your name, address, social security number, tax ID number, assets, income, investment objectives, financial situation and debt
  - Information we obtain (or may obtain) for the purpose of tax reporting to you and to the various agencies to which we report as required by law, including disclosures on various Internal Revenue Service (“IRS”) forms that we collect for tax reporting purposes.
- Information about your securities and/or other transactions such as:
  - Information we collect and relates to account balance, payment history, trading activity and any other transactions concerning which we provide investment advisory services or investment management services
  - Information we collect as part of servicing your account(s).
- Information about your transactions with nonaffiliated third parties such as:
  - Information from nonaffiliated third parties pursuant to law, rules, regulations, standard securities industry practice and/or legal process, including information and/or documents received, shared, produced or provided in connection with a subpoena, discovery request or other legal process compelling production
  - Information from nonaffiliated third parties related to servicing your account for purposes of providing investment management services.

## **5. Nonpublic Personal Information Disclosed to Affiliates and Nonaffiliated Third Parties**

We disclose to affiliates and nonaffiliated third parties nonpublic personal information only in connection with us providing investment management services or in respect of conducting our investment advisory business. Such disclosures include, among other things, information related to transactions, settlement, billing, payment, processing, clearing, transferring, reconciling, collection and tax reporting. Such disclosures may be provided to affiliates and nonaffiliated third parties:

- As required or necessary to carry out fully and properly the business conducted by us such as
  - Disclosures to affiliated and nonaffiliated third party service providers who supply us with computer related, document processing and delivery, and data maintenance
  - Processing services, and disclosures to nonaffiliated third parties such as securities clearing agencies and entities
- As required by law or legal process
- With your consent

## **6. Former Customers**

We will disclose nonpublic personal information about the former Clients of our investment advisory and investment management business only as permitted and/or required by law or legal process, or with your consent.

## **7. When You Can Limit Sharing**

Federal law gives you the right to limit only: (1) sharing for affiliates' everyday business purposes, (2) sharing with affiliates to use your information to market to you, and (3) sharing with non-affiliates to use your information to market to you. We do not share your information in any of these ways. State laws and individual companies may give you additional rights to limit sharing.

## **8. Confidentiality and Security of Nonpublic Personal Information**

We are committed to implementing and maintaining commercially reasonable and appropriate measure to maintain your nonpublic personal information in a secure and confidential fashion. Our information and security procedures include, but are not limited to, the following features:

- Access controls on customer information systems, including controls to authenticate and permit access only to authorized individuals and controls to prevent our employees from providing nonpublic personal information to unauthorized individuals who may seek to obtain this information through fraudulent means.
- Physical access restrictions at locations containing nonpublic personal information, such as buildings, computer facilities and record storage facilities to restrict access to unauthorized individuals.
- Encryption, where appropriate, of electronic customer nonpublic personal information.

- Segregation of duties for our employees with responsibilities for or access to nonpublic personal information.
- Monitoring systems and procedures to detect actual and attempted attacks on or intrusions into information systems containing nonpublic personal information.
- Response programs that specify actions to be taken when we suspect or detect that unauthorized individuals may have gained access to nonpublic personal information.
- A disaster recovery plan to protect against loss or damage to nonpublic personal information due to potential hazards, such as fire and water damage or technological interruption or failure.

We regularly review, revise and update our information security program to account for changes in technology.

We reserve the right to change this Privacy Policy at any time.

## **9. Maintenance of Records & Identity Theft Procedures**

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. After this required period of record retention, all such information will be destroyed. Orcam Financial Group does not maintain online user databases or maintain user credit card or financial information in any custodian manner. All personal records are kept in the home office and are under lock and key at all times accessible only to the Chief Compliance Officer and Founder. Additionally, all online payments and processing are done through secure third party vendors. Orcam has no involvement in the actual processing of payments, custody of assets or transfer of funds.

Orcam Financial Group regularly updates and reviews the maintenance of records and client data to ensure that the aforementioned security procedures remain secure.

## **10. Notice to Clients**

We will send you notice of our privacy policy annually for as long as you maintain an ongoing relationship with us. Periodically we may revise our privacy policy, and will provide you with a revised policy if the changes materially alter the previous privacy policy. We will not, however, revise our privacy policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

## **11. Opting Out**

Section 502(a) of the G-L-B Act generally prohibits a financial institution, directly or through its affiliates, from sharing nonpublic personal information about a consumer with a nonaffiliated third party unless the institution (i) provides the consumer with a notice of the institution's privacy policies and practices, (ii) provides the consumer with a clear and conspicuous notice that the consumer's nonpublic personal information may be disclosed to nonaffiliated third parties, (iii) gives the consumer an opportunity to opt out of that disclosure, and (iv) informs the consumer how to opt out.

Consumers can opt out of allowing Orcam Financial Group LLC to share their non-public information with unaffiliated third parties by sending in a written request to Orcam Financial Group LLC. Orcam

Financial Group LLC will retain this opt out on file for as long as the account is open. In the event a client leaves the adviser and returns at a later date, a new opt out notice would be required.

## **12. Requests for Information**

We direct our Clients or other interested persons who have any questions about our privacy policies or procedures, to contact Cullen Roche by phone at (858) 220-5383.