

Privacy Policy – Baldwin Financial Advisors, LLC - Registered Investment Advisor (RIA), Illinois

Baldwin Financial Advisors, LLC (“we,” “our,” “us”) is committed to protecting your nonpublic personal information, in compliance with the Gramm-Leach-Bliley Act (GLBA), SEC Regulation S-P (including the 2024–2025 amendments), and the Illinois Securities Law of 1953, along with its implementing regulations. This policy outlines how we collect, use, disclose, and safeguard nonpublic personal information about clients and prospective clients.

1. Scope

This Policy applies to current, prospective, and former individual clients who obtain financial planning or advisory services for personal, family, or household purposes. Business or commercial clients are out of scope unless otherwise required by law.

2. Information We Collect

We collect information necessary to deliver financial planning and advisory services, including:

- Contact details (name, address, email, phone number).
- Identifiers (date of birth, SSN or taxpayer ID; driver’s license or government ID).
- Financial information (income, assets, liabilities, account numbers, transactions, investment objectives, risk tolerance).
- Family/beneficiary and estate planning information.
- Employment and business information.
- Tax, insurance, financial accounts and legal documents you provide.
- Digital interaction data from our website/client portal (log-in, device, communications metadata).

3. Sources of Information

- Direct interactions (meetings, forms, questionnaires, emails, phone calls).
- Your authorized third parties (custodians, employers, insurance carriers, attorneys, CPAs, trustees).
- Public records and commercially available data.
- Our website and client technology platforms.

4. How We Use Information

- Provide, administer, and improve financial planning and advisory services.
- Develop plans, analyses, and recommendations tailored to your goals and risk profile.
- Communicate with you and deliver reports.
- Comply with legal, regulatory, and professional obligations (including books and records).
- Maintain billing and account administration.
- Protect our systems, detect fraud, and manage risk.

5. Sharing and Disclosure

We do not sell your personal information. We may share your personal information with the following:

- Service providers under written agreements and oversight (IT, storage, client portals, printing/ mailing).
- Professional partners at your direction (custodians, brokers, insurers, attorneys, CPAs, trustees) as necessary.
- Regulators, law enforcement, courts, or as required by law.

We restrict service providers from using client information for their own marketing and implement contractual and technical safeguards, including due diligence and monitoring.

6. Safeguards & Incident Response (Regulation S-P)

We maintain written policies and procedures with administrative, technical, and physical safeguards to protect customer records and information. Our incident response program is reasonably designed to detect, respond to, and recover from unauthorized access to or use of customer information, including procedures to assess scope, contain/control the incident, and notify affected individuals of unauthorized access to sensitive customer information as soon as practicable, and no later than 30 days, subject to limited exceptions. We also maintain oversight of service providers through due diligence and monitoring.

7. Illinois Requirements

As an Illinois-registered or operating investment advisor, we comply with Illinois regulations incorporating GLBA privacy provisions and maintain required books and records and advisory disclosures under the Illinois Securities Law of 1953 and Part 130 of the Administrative Code.

8. FINRA Applicability

If implementing your financial plan requires us to act in a brokerage or investment capacity - as registered representatives of an outside investment firm or broker-dealer - then all applicable FINRA rules and guidance on safeguarding customer information (including identity-theft red flags, business continuity, and related obligations) apply to those activities. In such cases, those requirements are administered under the policies and procedures of the selected investment firm or broker-dealer and are outside of the scope of your planning work with BFA, LLC.

9. Data Retention

We retain personal information as long as necessary to provide services, satisfy regulatory recordkeeping requirements (including books and records rules), resolve disputes, and enforce agreements. When retention is no longer required, we securely delete or de-identify information.

10. Your Rights & Choices

- Access and obtain a copy of certain personal information.
- Request correction of inaccurate information.
- Request deletion or restriction where permitted by law.
- Opt out of certain marketing communications.

To exercise rights, contact us using the details below. We will respond within applicable timeframes.

11. Children's Information

Our services are directed to adults. We do not knowingly collect information from children under 13.

12. Updates

We may update this Policy. The Effective Date will be revised and material changes communicated via our website, client portal, or direct notice.

13. Contact

Firm Name: Baldwin Financial Advisors, LLC
Compliance Officer: Kathleen (Kate) B. Leipprandt
Address: 44 S Vail Ave, Suite 103, Arlington Heights, IL 60005
Email: Plan@BFinancialAdvisors.com
Phone: 847-253-3185

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