

RAFALSKI HARE, PC PRIVACY POLICIES

Your privacy is important to us, and maintaining your trust and confidence is one of our highest priorities. We respect your right to keep your information confidential and understand your desire to avoid unwanted solicitations. We have always safeguarded the confidentiality of information provided to us by our clients and are bound by our professional standards to continue to maintain this vital aspect of our professional relationship.

We hope that by taking a few minutes to review our privacy policy, you will have a better understanding of what we do with the information you provide us and how we keep it private and secure.

Acquisition of Client Information

The firm collects nonpublic information about our clients from the following sources:

- **Information You Provide:** Our client engagements routinely require us to obtain private information about our clients so that we can proceed with the various services we perform for our clients as part of the professional relationship. We may collect information from:
 - Interviews and phone calls with you,
 - Letters or e-mails from you,
 - Tax return or financial planning organizers, and
 - Financial history questionnaires.
- **Other Sources:** Depending upon the particular service a client has engaged the firm to complete, we may request nonpublic information concerning the matter at hand. However, this information is never obtained without our client's specific authorization for the type of information and the source(s) from which it may be obtained.

Parties to Whom We Disclose Information

As a general rule, we do not send out or disclose nonpublic information about our clients or former clients to anyone. Nonpublic information is defined in the regulations as any publicly available information that we acquire by using information you have

provided us in connection with any professional services we perform for you, which is not public information. However, to the extent permitted by law and any applicable State Code of Professional Conduct, certain nonpublic information about you may be disclosed in the following situations:

1. Employees of the firm: Employees who need such information to conclude a transaction for which the client has engaged the firm.
2. Service Providers: As with any business, we have our own accounting, insurance and other service firms that we may need to provide information that the regulations consider nonpublic information. An example might be your account activity for our accounting firm to prepare financial statements for our internal or external purposes. Another example would be computer consultants that must have access to certain client records so as to be able to increase the efficiency of our computer processing systems. We have always insisted that any such information that needed to be disclosed for a business purpose be considered confidential and not used for any purpose other than the specific business need. That well-understood business policy of confidentiality will be reinforced as needed by contractual agreements between such service providers to the firm, referencing the Federal Trade Commission (FTC) regulations.
3. To comply with a validly issued and enforceable subpoena or summons.
4. In the course of a review of our firm's practices under the authorization of a state or national licensing board, or as necessary to properly respond to an inquiry or complaint from such a licensing board of organization.
5. In conjunction with a prospective purchase, sale, or merger of all or part of our practice, provided that we take appropriate precautions (for example, through a written confidentiality agreement) so the prospective purchaser or merger partner does not disclose information obtained in the course of the review.
6. As a part of any actual or threatened legal proceedings or alternative dispute resolution proceedings either initiated by or against us, provided we disclose only the information necessary to file, pursue, or defend against the lawsuit and take reasonable precautions to ensure that the information disclosed does not become a matter of public record.
7. To provide information to affiliates of the firm and nonaffiliated third parties who perform services or functions for us in conjunction with our services to you, but only if we have a contractual agreement with the other party which prohibits them from disclosing or using the information other

than for the purposes for which it was disclosed. (Examples of such disclosures include using an outside service bureau to process tax returns or engaging a records-retention agency to store prior year records.)

8. Others: Other than as state above, we do not disclose nonpublic information, or any other information, to any outside party without specific client authorization. An example would be other professionals who are assisting the firm in carrying out a client engagement. In such a case, we would require the client's approval for such a disclosure.

Client Requests to Release Information

Frequently our clients request we send non-public information to banks or other third parties. Prior to furnishing this information, we are required to have on file, a signed Consent to Disclose Financial Information form. This form will be provided to you upon request or can be found on our website.

Security Arrangements

We maintain physical, electronic and procedural safeguards that comply with federal regulations to guard our clients' nonpublic personal information and any other information, to ensure our clients that their privacy is a major part of the firm's commitment to provide the finest service possible.

Opt Out Provision

The Federal Trade Commission regulations provide that this notice must include a provision for you to request that the firm not release your nonpublic personal information. While such a request is unnecessary, because the firm does not disclose your nonpublic personal information in a manner that would allow you to opt out, in the interests of satisfying regulations, we include this Opt Out Provision.

Contact Us

Please call us at 248-598-5030 if you have any questions, because your privacy, our professional standard, and the ability to provide you with quality professional services are very important to us.