



Dear Clients of GoTo Financial,

We are very diligent within our firm on all issues of security and have been this way since our founding. Our client data is stored digitally on the Internet Cloud by 3<sup>rd</sup> party vendors including but not limited to Dropbox, Microsoft One Drive, Google Drive, Sync.com or Amazon Web Services. Data is accessible only with password and whenever available a secondary level of access known as “Two-Step Verification” is utilized to gain access to digital files.

Those granted access to client files are required to use sophisticated passwords of at least nine characters when available (combination of letters numbers and symbols). Access users are given guidelines to never accept auto logon available for that machine or Internet device access point. GoTo Financial provides reminders or automatic resets to access users to change their password on a minimum of an annual basis.

Files containing sensitive information such as social security numbers will also be stored on the Internet Cloud but will be given an additional level of protection before access is granted. Sensitive client files will additionally be encrypted with a 3<sup>rd</sup> party encryption program and using a minimum 12 digit mixed character logon that is different than other computer logons in the office (password is periodically changed and varies). We backup our data online using an encrypted service from third party provider Veracrypt, and we backup to external drives that are encrypted using AES, Serpent and Twofish ciphers or cascaded algorithms AES-Twofish, AES-Twofish-Serpent, Serpent-AES, Serpent-Twofish-AES and Twofish-Serpent.

Never send an unsecured e-mail to anyone that includes your account number or social security information. For emailing of PDF or other documents that contain sensitive information we will send password enabled. For the secure digital transfer of documents, we will also offer clients, vendors and client support professionals a secure upload service form Dropbox.

For client files such as performance reports or other files for client access we use a 3<sup>rd</sup> party vendor. These files are enclosed in a digital folder accessible with a distinct link and password for each client.

GoTo Financial offers free remote dial in access to control your computer or device when the client is in front of their device and grants access. We do not leave software or have ability to access without client acceptance. If using this remote service make sure to keep any open files or windows that you deem private closed and not viewable. Never share your password with

anybody at GoTo Financial, Schwab or otherwise. Please notify us immediately should anybody ever ask you for a password. Notify us immediately if you ever feel or think something is suspicious as our policy is to default to paranoid and investigate all client inquiries into information safety. [info@gotofinancial.com](mailto:info@gotofinancial.com) subject line; safety concern of my information.

We also have internal policies at our firm for additional levels of safety and protection and these include; client notifications whenever we send or receive client checks, daily review of client activity in all accounts under our discretionary supervision and we have a personal database with client personal info.

One additional item we would like from our clients is a recent picture of all account holders. We will store these pictures(s) on our database and assist a local Schwab branch should a client need additional verification. This picture is not a Schwab policy but an added level of security that GoTo Financial employs. By having an image of our client when we discuss your account leads to more personalization and care opposed to simply looking at account numbers and stats.

Schwab offers secure name passwords and we highly encourage all our clients to enroll in this free service. These are keywords that you create and give to Schwab for entry on their system. Once on the Schwab computer database then any verbal access with a Schwab operator must need that keyword. The advantage is a level of protection beyond common information such as birthdates, and addresses. We would prefer all our customers take this extra level of security and this can easily be accomplished by calling Schwab Rep and requesting a keyword password be added to account. The disadvantage is being locked out verbally, if you were to lose or forget your keyword. Keyword reset can only be accomplished by physically going to a Schwab branch and proving your identity. Schwab is strict on this keyword security and will hang-up and not call back a client that gives the wrong keyword. No hints, no help! At GoTo Financial we can also help you with your keyword backup. Please call Schwab 800-515-2157 to add Keyword security to your account.

For an added level of online protection Schwab will offer our clients free electronic tokens. [http://www.schwab.com/public/schwab/nn/legal\\_compliance/schwabsafe/we\\_guard\\_your\\_account](http://www.schwab.com/public/schwab/nn/legal_compliance/schwabsafe/we_guard_your_account)

At GoTo Financial we have a preference for sharing secure links but sometimes we will send PDF attachments. Our intention is to only send PDF with password unless the information has no sensitivity to privacy. Our firm believes in this concept so much we will offer personal help to any client in need of assistance on how to accomplish this for their own correspondence.

Professional scammers are on the rise and this entire social media is giving them more ways of accomplishing their bad deeds. Schwab has provided some good guidelines to make your interactions as safe as possible.

[http://www.schwab.com/public/schwab/nn/legal\\_compliance/schwabsafe](http://www.schwab.com/public/schwab/nn/legal_compliance/schwabsafe).

Beware of e-mails requesting password resets and other requests. They might look like official documents and the site links they send you to might look official. The best method is to call us at GoTo Financial or Schwab to verify the authenticity of an e-mail. Do not click or do anything else with the email. You might be asked to forward email to Schwab technology services department for further examination.

Https:// is the abbreviation we look for in using any website and the “s” portion of https, represents secure. We highly suggest our clients use a 3<sup>rd</sup> party vendor to periodically client their device system and also periodically check for viruses or other potential threats to their privacy.

GoTo Financial also has a business continuity plan in place, in the event of an emergency to keep business functions and client service in operation. There are many other internal security processes we keep at GoTo Financial and we thought it best to share with you some extra security measures you can take on your own.

## **GoTo Financial**

### **PRIVACY NOTICE REGARDING CLIENT PRIVACY AS REQUIRED BY REGULATION S-P & REGULATION S-AM**

Maintaining the trust and confidence of our clients is a high priority. That is why we want you to understand how we protect your privacy when we collect and use information about you, and the steps that we take to safeguard that information. This notice is provided to you on behalf of GoTo Financial.

**Information We Collect:** In connection with providing investment products, financial advice, or other services, we obtain non-public personal information about you, including:

- Information we receive from you on account applications, such as your address, date of birth, Social Security Number, occupation, financial goals, assets and income;
- Information about your transactions with us, our affiliates, or others; and
- Information received from credit or service bureaus or other third parties, such as your credit history or employment status.

**Categories of Information We Disclose:** We may only disclose information that we collect in accordance with this policy. GoTo Financial does not sell customer lists and will not sell your name to telemarketers.

**Categories of Parties to Whom We Disclose:** We will not disclose information regarding you or your account with us, except under the following circumstances:

- To your authorized Registered Representative and his or her manager;
- To our parent companies or their affiliates, to the extent permitted by law;
- To entities that perform services for us or function on our behalf, including financial service providers, such as a clearing broker-dealer, investment company, or insurance company;
- To consumer reporting agencies,
- To third parties who perform services or marketing on our behalf;
- To your attorney, trustee or anyone else who represents you in a fiduciary capacity;
- To our attorneys, accountants or auditors; and
- To government entities or other third parties in response to subpoenas or other legal process as required by law or to comply with regulatory inquiries.

**How We Use Information:** Information may be used among companies that perform support services for us, such as data processors, technical systems consultants and programmers, or companies that help us market products and services to you for a number of purposes, such as:

- To protect your accounts from unauthorized access or identity theft;
- To process your requests such as securities purchases and sales;
- To establish or maintain an account with an unaffiliated third party, such as a clearing broker-dealer providing services to you and/or GoTo Financial;
- To service your accounts, such as by issuing checks and account statements;
- To comply with Federal, State, and Self-Regulatory Organization requirements;
- To keep you informed about financial services of interest to you.

Regulation S-AM: Under Regulation S-AM, a registered investment adviser is prohibited from using eligibility information that it receives from an affiliate to make a marketing solicitation unless: (1) the potential marketing use of that information has been clearly, conspicuously and concisely disclosed to the consumer; (2) the consumer has been provided a reasonable opportunity and a simple method to opt out of receiving the marketing solicitations; and (3) the consumer has not opted out. GoTo Financial does not receive information regarding marketing eligibility from affiliates to make solicitations.

Our Security Policy: We restrict access to nonpublic personal information about you to those individuals who need to know that information to provide products or services to you and perform their respective duties. We maintain physical, electronic, and procedural security measures to safeguard confidential client information.

Closed or Inactive Accounts: If you decide to close your account(s) or become an inactive customer, our Privacy Policy will continue to apply to you.

Complaint Notification: Please direct complaints to: Compliance, at GoTo Financial, 4768 Park Granada #108 Calabasas, CA 91302 818.835-9056.

Changes to This Privacy Policy: If we make any substantial changes in the way we use or disseminate confidential information, we will notify you. If you have any questions concerning this Privacy Policy, please contact us at: GoTo Financial 4768 Park Granada #108 Calabasas, CA 91302 818.835.9056.