

Privacy Protection Policy

Pursuant to the Public Act No. 08-167, an act concerning the confidentiality of Social Security numbers, it is Halloran & Sage's policy to protect the confidentiality of Social Security numbers and personal information obtained and used in the course of business from its employees and clients.

For the purposes of this privacy policy, "personal information" means information capable of being associated with a particular individual through one or more identifiers, including, but not limited to, a social security number, a driver's license number, a state identification card number, an account number, a credit or debit card number, a passport number, an alien registration number or a health insurance identification number, and does not include publicly available information that is lawfully made available to the general public from federal, state or local government records or widely distributed media.

Applicability

This Policy applies to all Halloran & Sage employees and Partners of the firm. Any employee or Partner violating the provisions of this policy may result in disciplinary action, up to and including termination of employment. Individuals may also be subject to the civil and criminal penalties as stated under the Privacy Act No. 08-167.

Operating Procedures

I. *Disclosure of Social Security Numbers and Personal Information:*

The disclosure of Social Security numbers and personal information collected will be limited and/or restricted to only firm employees and partners who need such information for the business purposes of adequately protecting and representing client interest, facilitation of benefit plans, or verification and reporting as required by federal and state law.

Social Security numbers or personal information will not be shared with third parties unless deemed necessary for business purposes, required by law, or we have received authorization to disclose such information.

II. *Confidentiality of Security of Social Security Numbers and Personal Information:*

Firm employees and partners granted such access will take all necessary precautions to protect the confidentiality and ensure the integrity of the personal information that include such numbers when the records are not being used. All documents containing Social Security numbers and personal information shall be stored in locked secured areas.

The firm will maintain procedural safeguards to protect from misuse any Social Security numbers or personal information when used or stored in open computer transmissions, company distributions, or through the company intranet. All computer applications containing Social Security numbers and personal information shall be password protected and maintained on secured, authorized-access computer stations only.

III. *Disposal of Social Security Numbers and Personal Information:*

Paper documents or electronic copies of documents containing social security numbers and personal information will be destroyed, erased, or shredded when those documents no longer need to be retained by the firm.