



PRIVACY POLICY November 30, 2016

Title V of the Gramm-Leach-Bliley Act of 1999 requires advisers to protect the security and confidentiality of their clients' personal financial information. SEC "Regulation S-P" implements the requirements of Title V with respect to Registered Investment Advisers.

We take our responsibility to protect the privacy and confidentiality of client information very seriously. We maintain physical, electronic and procedural safeguards that comply with federal standards to store and secure information about you from unauthorized access, alteration and destruction.

In the normal course of our business we collect nonpublic personal information about clients (this term defined to be inclusive of prospective and former clients) from information received from the client on applications and other forms, and from information about client transactions with us. We restrict access to nonpublic personal information to employees and contractors. Employees and contractors are to treat this information as confidential.

We do not disclose any nonpublic personal information about our clients to anyone, except as permitted by law. As permitted by law, we may disclose personal information to companies that effect, administer, or enforce a transaction that is requested or authorized by the consumer. That would include for example:

Client's brokerage firm, trust co., bank, or transfer agent;

- To persons acting in a fiduciary capacity on behalf of the client, such as an attorney, accountant or insurance agent;
- To anyone with the consent or at the direction of the consumer.
- For a complete list, see Reference file.

We may disclose nonpublic personal information about clients with nonaffiliated third parties under exceptions provided in SEC Regulation S-P, Sections 248.13 through 248.15, and as otherwise required or permitted by law:

Financial services providers, such as account custodians, stock brokerage and securities firms, account aggregation services, mortgage bankers, insurance agents, real estate professionals, daily money managers and accountants;

Non-financial vendors, such as financial planning, portfolio management and investment analysis software providers, proxy voting services, e-mail, document vault and file archiving services, as well as website and blog hosting providers.

If our policy changes and we begin to disclose nonpublic personal information outside the exception, as to a party performing services to TWM, we will provide customers with an Opt-out right and allow a reasonable time to opt out. Alternatively, we may provide an initial Policy Notice to the client AND enter into a Confidentiality Agreement with the third party.

INITIAL AND ANNUAL PRIVACY NOTICES

TWM provides a Privacy Policy Notice to each individual who becomes a client along with the ADV brochure.

TWM must provide an annual notice which is identical to the then current initial notice.

We have established safeguards to protect the security and confidentiality of physical and digital customer records and information.

ADMINISTRATIVE SECURITY

The CCO is the designated person responsible for monitoring internal access to customer records and information and determining who has access rights to covered information.

The designated person will periodically identify and assess the risks that may threaten protected information and adjust procedures to account for changes in technology, the sensitivity of the protected information, and internal or external threats to information security.

PHYSICAL SECURITY

- The office is secure and files are restricted from access by outside parties.
- Confidential client documents and records are maintained in electronic format, except for papers in process.
- Employees are to shred sensitive discarded paper records.
- Employees are to erase/destroy electronic media before discarding.
- Computers are secure and restricted to employee access only.
- The computer network is protected by a firewall;

DIGITAL SECURITY

TWM has established written supervisory procedures for technology and social media usage, and for protecting the security of client information, including electronic information. TWM systematically reviews and tests compliance with its Written Supervisory Procedures, as well as the following:

- Privacy policy testing in accordance with SEC Reg. S-P
- Massachusetts Written Information Security Policy (WISP)
- Red Flags Identity Theft Prevention and Protection (ITPP)_SEC Reg. S-ID
- Technology Inventory covering Internal Precautions, External Providers and Hardware.
- E-mail failsafe retention and surveillance.
- Social media usage and retention

TECHNICAL SAFEGUARDS

All employees and contractors will enter into a confidentiality agreement upon employment.

Employees shall take other reasonable steps in protecting customer records as may be necessary from time to time.

Note that any records that must be maintained for recordkeeping purposes will be maintained for the required length of time. Discarded paper records and electronic media will only be disposed of after ensuring that appropriate records are maintained for the required length of time.

If we receive credit reports about clients, we must have a document disposal policy.

Documents containing client account log in and password information and TWM password information must themselves be password protected or stored in a digitally secure fashion.

STATE-SPECIFIC REGULATIONS

In response to a Massachusetts law, clients must “opt-in” to share non-public personal information with non-affiliated third parties before any personal information is disclosed. We may disclose non-public personal information to other financial institutions with whom we have joint business arrangements for proper business purposes in connection with the management or servicing of your account.

IF YOU HAVE ANY QUESTIONS OR CONCERNS ABOUT THIS PRIVACY POLICY NOTICE, PLEASE WRITE TO US AT:

Thompson Wealth Management, Ltd.
30 Monument Square, Suite 101
Concord, Massachusetts 01742