

Confidentiality and Privacy Policy

<http://zyppages.com/1/6503466078/PRIVACY-POLICY>

This Confidentiality and Privacy policy discloses the privacy practices used by Elena Smirnov-Otis DBA Global Asset Protection Solutions.

CFP Board's new *Code of Ethics and Standards of Conduct* ("Code and Standards"), which takes effect on October 1, 2019, includes a duty of Confidentiality and Privacy that identifies the specific circumstances when it would not be a violation of the *Code and Standards* to disclose a Client's non-public personal information, limits a CFP® professional's use of the information, requires a CFP® professional to take reasonable steps (directly or through the CFP® Professional's Firm) to protect the security of the information, and requires a CFP® professional to adopt, implement, and provide notice to Clients of policies regarding the protection, handling, and sharing of the information.

We take precautions to keep clients' information confidential and may not disclose any non-public personal information about any prospective, current, or former Client," subject to specific exceptions.

We may disclose information for ordinary business purposes:

1. With the Client's consent, so long as the Client has not withdrawn the consent;
2. To a CFP® professional's employer, partners, employees, or other persons with whom the CFP® professional is providing services to or for the Client, when necessary to perform those services;
3. As necessary to provide information to the CFP® professional's attorneys, accountants, and auditors; and
4. To a person acting in a representative capacity on behalf of the Client. A CFP® professional may disclose information for legal and enforcement purposes:
 1. To law enforcement authorities concerning suspected unlawful activities, to the extent permitted by the law;

2. As required to comply with federal, state, or local law;
3. As required to comply with a properly authorized civil, criminal, or regulatory investigation or examination, or subpoena or summons, by a governmental authority;
4. As necessary to defend against allegations of wrongdoing made by a governmental authority;
5. As necessary to present a civil claim against, or defend against a civil claim raised by, a Client;
6. As required to comply with a request from CFP Board concerning an investigation or adjudication; and
7. As necessary to provide information to professional organizations that are assessing the CFP® professional's compliance with professional standards. We are prohibited from using any non-public personal information about a Client for our direct or indirect personal benefit, whether or not it causes detriment to the Client, unless the Client consents.

We also take reasonable steps to protect the security of non-public personal information about any Client, including the security of information stored physically or electronically, from unauthorized access that could result in harm or inconvenience to the Client.

We will not share your information with any third party outside of our organization, other than as necessary to fulfill your request, e.g. to ship an order.

Unless you ask us not to, we may contact you via email in the future to tell you about specials, new products or services, or changes to this privacy policy.

Your Access to and Control Over Information

You may opt out of any future contacts from us at any time. You can do the following at any time by contacting us via the email address or phone number.

- See what data we have about you, if any.
- Change/correct any data we have about you.
- Have us delete any data we have about you.
- Express any concern you have about our use of your data.

Security

Whenever we collect sensitive information (such as credit card data), that information is encrypted and transmitted to us in a secure way. You can verify this by looking for a closed lock icon at the bottom of your web browser, or looking for "https" at the beginning of the address of the web page.

While we use encryption to protect sensitive information transmitted online, we also protect your information offline. Only employees who need the information to perform a specific job (for example, billing or customer service) are granted access to personally identifiable information. The computers/servers in which we store personally identifiable information are kept in a secure environment.

Updates

Our Privacy Policy may change from time to time. Please visit <http://zyppages.com/1/6503466078/PRIVACY-POLICY> for the latest updates

If you feel that we are not abiding by this privacy policy, you should contact us immediately via telephone at 650-346-6078 or via elena@gaps-usa.com.