



1615 5<sup>th</sup> Avenue • Moline, IL 61265  
[www.firststepcashmanagement.com](http://www.firststepcashmanagement.com)

## **PRIVACY NOTICE**

First Step Cash Management, Inc. (referred to as “FSCM”) maintains physical, electronic, and procedural safeguards that comply with federal standards to protect its clients’ nonpublic personal information (“information”). Through this policy and its underlying procedures, FSCM attempts to secure the confidentiality of customer records and information and protect against anticipated threats or hazards to the security or integrity of customer records and information.

It is the policy of FSCM to restrict access to all current and former clients’ information (i.e., information and records pertaining to personal background, investment objectives, financial situation, tax information/returns, investment holdings, account numbers, account balances, etc.) to those employees and affiliated/nonaffiliated entities who need to know that information in order to provide products or services in furtherance of the client’s engagement of FSCM. In that regard, FSCM may disclose the client’s information: (1) to individuals and/or entities not affiliated with FSCM, including, but not limited to the client’s other professional advisors and/or certain service providers that may be recommended or engaged by FSCM in furtherance of the client’s engagement of FSCM (i.e., attorney, accountant, insurance agent, broker-dealer, investment adviser, account custodian, record keeper, etc.); (2) required to do so by judicial or regulatory process; or (3) otherwise permitted to do so in accordance with the parameters of applicable federal and/or state privacy regulations. The disclosure of information contained in any document completed by the client for processing and/or transmittal by FSCM to facilitate the commencement/continuation/termination of a business relationship between the client and/or between FSCM and a nonaffiliated third party service provider (i.e., broker-dealer, investment adviser, account custodian, record keeper, insurance company, etc.), including, but not limited to, information contained in any document completed and/or executed by the client in furtherance of the client’s engagement of FSCM (i.e., advisory agreement, client information form, etc.), shall be deemed as having been automatically authorized by the client with respect to the corresponding nonaffiliated third party service provider.

FSCM permits only authorized employees and affiliates who have signed a copy of FSCM’s Privacy Policy to have access to client information. Employees violating FSCM’s Privacy Policy will be subject to FSCM’s disciplinary process. Additionally, whenever FSCM hires other organizations to provide services to FSCM’s clients, FSCM will require them to sign confidentiality agreements and/or the Privacy Policy.

Should you have any questions regarding the above, please contact Eric Kies, Chief Compliance Officer.