BARGELD FINANCIAL, LLC.

A Registered Investment Adviser

Privacy Notice

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I. Introduction

Bargeld Financial is a registered investment adviser. And, as a registered investment adviser, the Company complies with the following regulations concerning consumer privacy:

i. The Securities and Exchange Commission's Regulation S-P (Privacy of Consumer Financial Information and Safeguarding Personal Information),
ii. The Gramm-Leach-Bliley Act,
iii. The Fair Credit Reporting Act,
iv. Regulation S-AM, and
v. The Pennsylvania Consumer Data Privacy Act (HB 1126)

1. Regulation S-P

The SEC's Regulation S-P, Privacy of Consumer Financial Information and Safeguarding Personal Information:

i. "Requir[es] covered institutions to adopt written policies and procedures for an incident response program to address unauthorized access to or use of customer information;
ii. "Requir[es] covered institutions to have written policies and procedures to provide timely notification to affected individuals whose sensitive customer information was or is reasonably likely to have been accessed or used without authorization; and
iii. "Broaden[s] the scope of information covered by Regulation S-P's requirements. (https://www.sec.gov/files/34-97141-fact-sheet.pdf)

2. The Gramm-Leach-Bliley Act

"The Gramm-Leach-Bliley Act requires financial institutions – companies that offer consumers financial products or services like loans, financial or investment advice, or insurance – to explain their information-sharing practices to their customers and to safeguard sensitive data." (https://www.ftc.gov/business-guidance/privacy-security/gramm-leach-bliley-act).

3. The Fair Credit Reporting Act

The Fair Credit Reporting Act, or "The Act (Title VI of the Consumer Credit Protection Act) [,] protects information collected by consumer reporting agencies such as credit bureaus, medical information companies and tenant screening services. Information in a consumer report cannot be provided to anyone who does not have a purpose specified in the Act. Companies that provide information to consumer reporting agencies also have specific legal obligations, including the duty to investigate disputed information. In addition, users of the information for credit, insurance, or employment purposes must notify the consumer when an adverse action is taken on the basis of such reports." (https://www.ftc.gov/legal-library/browse/statutes/fair-credit-reporting-act)

4. Regulation S-AM, Limitations on Affiliate Marketing

Regulation S-AM stipulates as follows:

Under Regulation S-AM, a covered person 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.

The notice and opt-out opportunity must be provided to a consumer before an affiliate uses eligibility information to make a marketing solicitation. The notice and opt-out opportunity must be provided to the consumer either: (1) by a company with which the consumer has or had a pre-existing business relationship; or (2) as part of a joint notice from two or more members of an affiliated group of companies, provided that at least one of the affiliates providing the joint notice has or had a pre-existing business relationship with the consumer.

Being a Pennsylvania state-registered investment adviser, Bargeld Financial complies with all Pennsylvania state privacy regulations relating actions in the conduct of investment services business. Our company also does, for the purpose of ensuring best practices, adopts and implements SEC rules and regulations regarding customer privacy protections, including Regulation S-P.

5. Regulation S-P / Privacy Rule

The purpose of these regulatory requirements and This privacy policy and attendant procedures are meant to provide administrative, technical and physical safeguards which assist Company staff in maintaining the confidentiality of non-public personal information financial ("NPI") collected from the consumers and customers of an investment adviser. All NPI, whether relating to an adviser's current or former clients, is subject to these privacy policies and procedures. Any doubts about the confidentiality of client information must be resolved in favor of confidentiality.

For these purposes, NPI includes non-public "personally identifiable financial information" plus any list, description or grouping of customers that is derived from non-public personally identifiable financial information. Such information may include personal financial and account information, information relating to services performed for or transactions entered into on behalf of clients, advice provided by the firm to clients, and data or analyses derived from such NPI.

II. Firm Responsibility

Bargeld Financial's compliance personnel will maintain and review, as well as implement and enforce, policies regarding protection of non-public personally identifiable information (NPPII). The company, does, in this light, work to ensure compliance with federal and state privacy laws and regulations.

The company may, in its enforcement of privacy protection laws and regulations, determine penalties for violation of the Company privacy policy, and likewise enforce such penalties.

The Company's compliance personnel will be responsible for making the firm's privacy policy available to staff and for providing training and ensuring compliance with, this policy.

III. Purpose of Privacy Policy and Notice

Bargeld financial has adopted, and implements, numerous procedures geared towards implementing the Company's privacy policy. These procedures are meant to ensure the Company's privacy policy is correctly implemented. The Company's privacy policy includes the following:

1. ***Non-Disclosure of Client's Non-Public Personally Identifiable Information (NPPII)***

Bargeld Financial maintains a privacy policy, and the company, likewise, adopts and implements procedures, which are meant to ensure the Company and its covered persons comply with federal and state privacy laws and regulations. And, the company's privacy-protection provisions are meant to protect against the disclosure of clients' non-public personally identifiable information. Bargeld Financial, therefore, refrains from sharing client's non-public information, excepting (in) the following circumstances:

i. As would be necessary for the company and its covered persons to provide the services, which the client requests,
ii. As would be required to complete a transaction as has been authorized by the client
iii. As is necessary to provide the service that the client has requested or authorized, or to maintain and service the client's account;
iv. As is required by regulatory authority, or by law enforcement personnel, who with jurisdictional authority, exercise oversight over our business, or matters therewith pertaining
v. As is required by applicable state and/or federal law
vi. As is required for the company to ensure protection of the Company's, or another financial institution's records
vii. As is needed to protect customers or affiliated entities against fraud,
viii. As is necessary to enhance institutional risk controls
ix. As is needed to ensure timely sharing of pertinent information with concerned personal such as accountants, attorneys, auditors or other internal or external persons and/or entities engaged in the business of ensuring compliance with laws, rules and regulations
x. As is necessary enhance firm's adherence to best practices

The company prohibits all covered persons, including current and former employees, from persons and/or entities outside of Bargeld Financial, excepting in circumstances listed above.

Covered persons, including employees, may share client non-public personally identifiable information with other employees and affiliates of Bargeld Financial only on a need-to-know basis, with sharing of client information to people who need such information to arrange, structure, or deliver a service to, or on behalf of, the client whose information is being shared.

2. ***Safeguarding and Disposal of Client Information***

Bargeld Financial restricts access to client non-public personally identifiable information to only employees who need to know this information to arrange, structure or deliver a service to the client whose information is being accessed or shared.

Bargeld Financial requires that persons with access to clients' non-public personally identifiable information keep such information in a secure location at all time
Staff must use utmost care when accessing and/or handling client information so as to not risk unauthorized disclosure of, or access to, client non-public personally identifiable information

Documentation relating client non-public personally identifiable information may not be transported by being placed in pockets. Persons transporting such documents must, instead, place such documents in a secure container before, and throughout, the process of transport or transfer.

Electronic copies of documents regarding non-public personally identifiable information must be stored in a secure password-protected file or electronic system. And the password protecting such files will be accessible to only to persons authorized to handle the client non-public information.

Bargeld Financial requires that covered persons, including employees, communicate, or discuss matters regarding, client non-public personally identifiable information in private spaces, where such communication would not be subject to inadvertent disclosure to unauthorized persons.
To ensure continued safeguard of client non-public information, Bargeld Financial has adopted the following procedures:

The Company maintains access controls on password-protected devices like computers, to ensure client non-public information is accessed by only authorized personnel.

The Company restricts individual access to physical spaces like locked cabinets containing client PINPI.

The Company maintains a system, which segregates from company information and files documents containing client PINPI.

The company conducts a quarterly review of company privacy procedures.

The firm will keep in a secure location information and documentation regarding client consumer reports, and require staff in possession of, or with access to, such information to follow company procedures regarding secure handling of client NPPII.

IV. Scope of Client Opt-Out Choice

Please be aware that any choice a client makes regarding sharing of his/her/sein account will apply to all accounts under that client's name, as well as to all persons on the account or accounts of the client making the privacy choice. This means that if a client chooses to opt out of having his/her/sein information shared, that this choice will apply to all accounts under this client's name, as well as to all persons on the affected accounts.

V. Initial Privacy Notice Delivery

Bargeld Financial will make available an initial copy of this privacy notice to natural person clients, and to natural persons representing institutional clients and all legal persons. The company will then provide its privacy policy, as amended, to all natural person clients and natural persons representing institutional clients and all legal persons.

The Company will, in the instance the company shares client PINPI with an outside/unaffiliated entity, with such disclosure not covered under a qualified exception under Regulation S-P, notify affected clients before such disclosure takes place. And such notice will provide the potentially affected clients an option to opt out of their information being shared.

VI. Updates and Annual Review

Bargeld Financial will periodically review the Firm's privacy policy and notice, as well as pertinent policies and procedures. Such review will happen at least once a year.

VII. Annual Privacy Notice Exception

Bargeld Financial will not provide a client an annual privacy notice in the following circumstances:

1. When Bargeld Financial only shares a client's non-public personally identifiable information in a manner, which does not require extension of an opt-out right to the client. These instances may include, but not be limited to, the following circumstances:
   a. When the Company discloses non-public information to service providers, affiliated or otherwise, or when purposes of detecting, or responding to, fraud dictate disclosure of client NPI.
   b. When the Company has not made changes to its privacy policy, whatsoever, since the last update, after which the Company's updated privacy policy was made available to clients. The firm will, in this case, make the privacy policy available to clients following review of, and/or updates to, the privacy policy.

VIII. Phone Messaging Policy

1. ***OBTAINING CONTACT INFORMATION:*** We collect information, including the names, phone numbers and email addresses of prospects from people providing us their names, email addresses and phone numbers when visitors to our website fill out and submit forms inquiring about our services. We also get prospect and client phone numbers from calls we receive from people inquiring about our services. We additionally accept referral names and contact numbers of people who can benefit from the services we provide. We receive this referral information from current prospects and clients.

2. ***CONSENT TO RECEIVING SMS MESSAGES:*** By providing a telephone number and submitting this form, you are consenting to being contacted by SMS text message. Messaging & data rates may apply.

3. ***OPT OUT:*** You can reply STOP to opt-out of further messaging with Bargeld Financial. Our inbound SMS phone number is (610) 321-5756. You may reach us at any time via voice or SMS to inquire about our services, or to submit a 'STOP' messaging request. Additionally, replying 'STOP' to any of our messages will ensure you no longer receive messages from Bargeld Financial.

4. ***INFORMATION NOT SHARED WITH THIRD PARTIES:*** No mobile information will be shared with third parties/affiliates for marketing/promotional purposes. All other categories exclude text messaging originator opt-in data and consent; this information will not be shared with any third parties.