PONDER
FINANCIAL GROUP

Ponder Financial Group Privacy Policy

Ponder Financial Group is committed to ensuring your financial privacy. This notice is being sent to comply with the privacy regulations of the Securities and Exchange Commission.

Our relationship with you is very important to us. We understand that you have entrusted us with your private financial information and we do everything we can to maintain that trust. We collect personal information from you to open your accounts(s) and to provide financial planning advice. We do not sell your personal information to anyone. It is our policy to withhold customer information from companies outside of Ponder Financial Group unless required for the operational support of delivering investment services. These companies are prohibited from using client information for anything beyond the intended services and will be denied access to client information if confidentiality cannot be ensured.

The following privacy policy is in effect at Ponder Financial Group:

- Only such information received from you, through application forms, financial planning documents, or otherwise, will be collected.
- None of such information about you (or former clients) will be disclosed to anyone, except as permitted by law (which includes disclosure to employees necessary to service your account).
- Policies and procedures (including physical, electronic and procedural safeguards) are in place that are designed to protect the confidentiality of such information.

For additional information about our privacy policy or if you have any questions, please call our office at 650-726-0850

755 Main Street • Half Moon Bay, CA 94019 • (650) 726-0850 • Fax: (650) 726-0849
info@ponderfinancial.com • www.ponderfinancial.com

PRIVACY POLICY

FACTS	WHAT DOES PONDER FINANCIAL GROUP DO WITH YOUR PERSONAL INFORMATION?

Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
What?	The types of personal information we collect and share depend on the product or service you have with us. This can include: • Social Security Number • Income • Investment experience • Risk tolerance • Retirement assets • Wire transfer instructions When you are no longer our customer, we do not continue to share your information as described in this notice.
How?	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Ponder Financial Group chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Ponder Financial Group share?
For our everyday business purposes- such as to process your transactions, maintain your account(s), respond to court orders and legal investigations.	Yes
For our marketing purposes- to offer our products and services to you.	No
For joint marketing with other financial companies	No
For our affiliates everyday business purposes- information about your creditworthiness.	No
For non affiliates to market to you	No

Questions	Call (650) 726-0850

What we do

How does Ponder Financial Group protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
How does Ponder Financial Group collect my personal information?	We collect your personal information, for example • Enter into an investment advisory agreement • When you open an account • Seek financial or tax advice • Seek advice about your investments • Tell us about your investment or retirement portfolio • Make deposits or withdrawals from your account
Why can't I limit all sharing?	Federal law gives you the right to limit only • Sharing for affiliates' everyday business – information about your creditworthiness. • Affiliates from using your information to market to you. • Sharing for non-affiliates to market to you. State laws and individual companies may give you additional rights to limit sharing. • California regulations require an affirmative opt-in before information can be shared with non-affiliated third parties; an opt-out for sharing amongst affiliates; and a self-addressed envelope with pre-paid postage if there is not at least two free ways to respond (e.g. toll free telephone or website).

Definitions

Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies. • Ponder Financial Group has no affiliates
Non-affiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies. • Ponder Financial Group does not share with non-affiliates so they can market to you.
Joint marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. • Ponder Financial Group doesn't jointly market.