

THE KENNETH ROBINSON COMPANY, D/B/A
PRACTICAL FINANCIAL PLANNING
Privacy Policy

(In this policy, “I” and “me” refer to Ken Robinson and/or The Kenneth Robinson Company.)

I am as concerned about my privacy as most consumers. So I have structured Practical Financial Planning’s privacy policy to maximize the client’s privacy. While some firms start with the minimally-required privacy measures and move slightly toward more protection, I take the view that Practical Financial Planning will provide the greatest privacy protection, as far as reasonably possible.

Accordingly, I commit to you that client files and non-public client information of any and every kind will remain absolutely confidential, with *only* these exceptions:

1. I use computer software to prepare income tax returns. My license for one such program sometimes imposes a charge on a per-return basis. To be sure the licensor (Lacerte) charges me appropriately, they collect minimal information for identification purposes, through a secure internet connection. They do *not* collect information for any other purpose. Lacerte has confirmed that they use this information solely to bill me for the use of the program. If you request electronic filing, your tax return is sent to the IRS and, in some cases, the state and taxing city/cities, through Lacerte or my other software provider, Drake. Tax return data is sometimes shared with the tax software provider to gain their technical assistance in the preparation of your returns, or with agencies such as RITA or CCA to resolve tax issues for clients.
2. I use a calendar program on my computer, which shows the names of clients and meeting times. From time to time, this information is visible to persons in my office, especially as I try to set up meeting times with them. Such information includes the clients’ names, date and time of the meeting, and an abbreviation or short phrase showing me the purpose of the meeting. This might be of concern to persons who wish to keep my professional relationship with them confidential. If you wish me to disguise your identity on this calendar program, I will be glad to do so at your request.
3. All my financial files, including client files, are open to review by proper legal authorities. For instance, the Division of Securities of the Ohio Department of Commerce licenses me as an investment advisor, and has the right to audit me and review my files. The purpose of such an audit is to ensure that the investment advisor follows applicable laws, rules and regulations designed to protect the client.
4. As with any information in any business, I would have to respond to proper legal process (such as a subpoena), if I should ever be served with one. However, I will never willingly divulge any confidential information without such process (or your consent), except as described in this policy. I will also make reasonable attempts to secure client information by invoking any applicable legal privilege on request.
5. Staff members, including temporary help, are given access to client information on a need-to-know basis. Staff members, including temporary help, are required to sign a confidentiality statement acknowledging the need for strict client privacy.

Client information is never sold, shared, or otherwise allowed outside of Practical Financial Planning, nor used for any marketing purposes whatsoever except those of Practical Financial Planning. I never sell or give to others client mailing lists of any kind.

If I modify this privacy policy, I will notify then-current clients. If you have questions about this privacy policy, or suggestions about how it can be improved, please call me at (216) 688-3737.