

# FACTS

## WHAT DOES H. A. KRAMER & ASSOCIATES, PA (HAKAPA) 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 depends on the services you have with us. This information can include:

- Account numbers, address, employment information, social security number, birth date
- Net worth, assets, income, investment experience
- Account balances/transactions, trading history, payment history
- Medical Information (if analyzing insurance)
- Personal feelings, your life story, and experiences

### How?

All financial companies at times may need to share parts of 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 why HAKAPA chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does HAKAPA share?	Can you limit this sharing?
<b>For our everyday business purposes</b> — we may share information about our clients to process transactions, maintain your account(s), or respond to court orders and legal investigations	Yes	No
<b>For our marketing purposes</b> —to offer new services to you	Yes	Yes
<b>For joint marketing with other financial companies</b>	No	We don't share
<b>For our affiliates' everyday business purposes</b> – we may share information about our clients with our affiliates to process transactions, maintain your account(s), or respond to court orders and legal investigations.	Yes	No
<b>For our affiliates' everyday business purposes</b> – information about your creditworthiness	No	No
<b>For our nonaffiliates' everyday business purposes</b> —we may share information about our customers with nonaffiliated companies who assist us in obtaining business or providing maintenance or customer service to your account(s). Furthermore, we may also share your information with auditors, regulators, and law enforcement organizations or in response to a subpoena or discovery request, as permitted or required by law.	Yes	No
<b>For our affiliates to market to you</b> — to offer new products or services to you	No	We don't share
<b>For nonaffiliates to market to you</b> — we do not sell, share, or disclose your nonpublic personal information to nonaffiliated third-party marketing companies	No	We don't share

### To limit our sharing

- Call (954) 424-2487 or email [info@hakapa.com](mailto:info@hakapa.com) or visit us online at [www.hakapa.com](http://www.hakapa.com)
- Mail your request to: 941 SW 88<sup>th</sup> Terrace, Plantation, FL 33322

**Please note:** If you are a *new* client, we can begin sharing your information [30] days from the date we provided this notice. When you are *no longer* our customer, we continue to share your information as described in this notice; however, you can contact us at any time to limit our sharing.

### Questions?

Call (954) 424-2487 or email [info@hakapa.com](mailto:info@hakapa.com)

## Who we are

<p><b>Who is providing this notice?</b></p>	<p>Advice and planning offered through H. A. Kramer &amp; Associates, PA, a Registered Investment Adviser, are separate and unrelated to Commonwealth.</p> <p>The owner of the firm, Howard Kramer, offers securities and fee-based asset management through Commonwealth Financial Network® (“Commonwealth”), member FINRA/SIPC, a Registered Investment Adviser.</p> <p>Fixed Insurance products offered through CES Insurance Agency.</p>
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## What we do

<p><b>How does HAKAPA protect my personal information?</b></p>	<p>HAKAPA recognizes the need to prevent unauthorized access to the information we collect, including information held in electronic format, and we protect your personal information in the following ways:</p> <ul style="list-style-type: none"> <li>■ We only grant access to your personal information to parties with whom we have executed confidentiality/nondisclosure agreements and who need that information to serve you or to assist us in conducting operations.</li> <li>■ We have physical and electron safeguards in place to ensure that we comply with our own policy, industry practices, and federal and state regulations.</li> <li>■ Our employees are trained in the proper handling of sensitive information.</li> <li>■ If you decide to become an inactive client, we will adhere to the privacy policies and practices as described in this notice.</li> </ul>
<p><b>How does HAKAPA collect my personal information?</b></p>	<p>HAKAPA collects nonpublic personal information from you, as well as from other sources. The sources and the information collected may include:</p> <ul style="list-style-type: none"> <li>■ Information you provide to us, to our affiliated entities, on applications and related forms, through discussions or phone calls with our staff, or on our website.</li> <li>■ Information regarding your history with us.</li> <li>■ Information from other nonaffiliated third parties, including employers, associations, benefit plan sponsors, and other institutions.</li> </ul>
<p><b>Why can't I limit all sharing?</b></p>	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> <li>■ Sharing for affiliates' everyday business purposes—information about your creditworthiness</li> <li>■ Affiliates from using your information to market to you</li> <li>■ Sharing for nonaffiliates to market to you</li> </ul> <p>State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.</p>
<p><b>What happens when I limit sharing for an account I hold jointly with someone else?</b></p>	<p>If you have a joint account, we will treat an opt-out direction by a joint customer as applying to all associated joint customers.</p>

## Other important information

If you live in an “opt-in” state, we are required to obtain your affirmative consent to share your nonpublic personal information with nonaffiliated third parties who do not currently assist us in servicing you or conducting our business.

**California residents:** For client with a California mailing address, we will not share your personal information with a financial company for joint marketing purposes, except as required or permitted by law.

**Definitions**

<b>Affiliates</b>	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>■ Commonwealth</li> </ul>
<b>Nonaffiliates</b>	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>■ This may include insurance companies, broker/dealers, investment advisers, mutual fund companies, banks, investment firms, third-party administrators, clearing firms, retirement plan sponsors, and other third parties.</li> </ul>
<b>Joint marketing</b>	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> <li>■ We don't have any joint marketing agreement.</li> </ul>

**What are "Cookies"?**

Cookies are very small files placed onto the hard drive of your computer the first time you visit our website (or any website) that enable servers to recognize who you are the next time you come back. Contrary to popular belief, cookies do not extract private or personal information from your computer's memory; rather, they record only information relating to your visit to a website. H. A. Kramer & Associates, PA uses cookies to track usage of the website and to address security issues. We may also use cookies to store your preferences relating to the use of the website. If you do not want to allow our website to place a cookie on your computer, you can **change** your browser's settings to deny cookies; however, this may affect your experience with certain features of the website.

**What is "Phishing"?**

Pronounced *fish*ing is the act of sending an email to a user or recipient falsely claiming to be an established legitimate enterprise in an attempt to scam the user into surrendering private information that will be used for identity theft. The email directs the user to visit a website where they are asked to update their personal information, such as passwords and credit card, social security, and bank account numbers that the legitimate organization already has. The website, however, is fraudulent and set up only to steal the user or recipient's information.

We rarely request sensitive information by E-mail, when we do request any personal or confidential information online or via E-mail HAKAPA will utilize an internet security service called **CFN Secure**. If you would like to learn more about this service, please call us at (954) 424-2487 or E-mail [info@hakapa.com](mailto:info@hakapa.com).

**Electronic Notification Consent Mail-in Form**

The privacy policy and practices for H. A. Kramer & Associates, PA is mailed to you every year. If instead you wish to receive future notification of the privacy policy and practices via e-mail please sign your consent below. You can fax this to **(954) 424-2489** or scan and send to **info@hakapa.com** or mail to **H. A. Kramer & Associates, PA, 941 SW 88<sup>th</sup> Terrace, Plantation, FL 33324**

<b>Name</b>	
<b>Address</b>	
<b>City, State, Zip</b>	
<b>E-mail</b>	