

# NRSMITH AND ASSOCIATES, PS AND SMITH & ASSOCIATES

Certified Public Accountants and Financial Planners  
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## Privacy Policy

This notice will advise you as to how we handle nonpublic, personal information used to provide professional services in *Smith & Associates*, our certified public accounting practice, and *NRSmith and Associates, PS*, our financial planning practice. This Privacy Policy applies both firms.

### Protecting Your Personal Information

1. Neither firm sells client information or provide such information to other organizations or businesses for marketing or any other purpose. Since we do not sell or market the information, you do not need to contact us in order to opt out of a consumer-marketing plan.
2. Each firm limits the collection and use of client information to that needed to complete our service to you (e.g., auditing, accounting, taxation, personal financial planning, and general consulting services) as required by law.
3. Each has physical, electronic and procedural safeguards in place to maintain the protection of private information.

### Sources and Types of Information

We receive information from you (such as name, address, Social Security number, wages, other income and sources of revenue, expenses, assets owned, etc.) when you first become a client or on an updating basis. Other sources may supply information such as your attorney, designated family member, or other people you have authorized to provide such information. Once you become a client, your interactions and transactions with us may also generate information such as payment history from invoices rendered or income/loss from assets bought/sold.

### Use and Disclosure of Information

We use your personal information to service your account. As permitted by law, the information arising from transactions with us may be disclosed only to legally assigned agents (i.e., the vendor providing us with tax compliance software), or other nonaffiliated third party as designated by you; however, this is done with your knowledge and permission only. These nonaffiliated third parties must agree to protect the confidentiality of the information we are providing. This must be authorized by you in advance.

### Future Notices

We will reaffirm this Privacy Policy with you annually in writing. While this policy may change as our businesses grow and develop, you can review our Privacy Policy at any time on our website by going to the *About* tab and selecting *Firm Information* at <http://www.nrsmith.com>.

**Retention Policy for Client Records**

(Paper or Electronic)

	<u>Retention Period in Years</u>
<b>Correspondence Files</b>	7
<b>Published Reports</b>	
Auditors' reports, audit or review financial statements, opinion and disclaimer	7
Compiled or reviewed monthly, quarterly or annual financial statements	7
Reports filed with government agencies	7
Agreed-upon procedures, special reports (fire losses, special investigations, etc.) from date of final disposition, as deemed appropriate by us	7
Systems reports	7
Drafts of reports	0
<b>Tax Files</b>	
Tax returns prepared by our firm; taxpayer retains original supporting documentation	7
Tax surveys, research reports, agents' examinations, and other special tax reports from date of final disposition	7
Special tax assignments, tax elections, inventory methods (includes IRS examination documents, Cost Segmentation Studies, etc.), basis information	Permanently
<b>Workpaper Files</b>	
Audited, reviewed, and year-end financial statements	7
Compiled monthly and quarterly financial statements	7
W-2's, Forms 1099, business/payroll tax reports, and personal property tax affidavits prepared by us	7
<b>Personal Financial Planning (PFP) Files</b>	
Investment management binders: Account applications, Letter of Agreement, Investment Policy Statement, bound recommendations, investment analysis and recommendations, orders, transactions, confirmations, basis and rate of return information, Quarterly Reports, investment statements, management fee invoices, and correspondence	Permanently
Investment management binders for former clients from date of final service	7
PFP project correspondence, final reports and recommendations	7
<b>General</b>	
Invoices to clients	7
Work-in-Progress, automatically purged upon final billing	0
E-mails – Messages containing no substantive information that are sent only to provide attachments are purged immediately and the documents incorporated in respective client file. However, E-mails with substantive information are saved electronically in the client's respective file and retained as indicated above.	0
Portal – Clients use our website Portal as a convenience to transmit documents that will be incorporated in their respective file. It is considered a temporary storage location; therefore, former clients will have their Portal account closed. Closure notification will only occur if files are still stored in the Portal.	0

<sup>1</sup> The above schedule applies to current and former clients, unless indicated otherwise.

<sup>2</sup> Whenever records are relevant to a pending lawsuit or charge of discrimination, they must be retained until final disposition of the lawsuit or charge, in accordance with Washington State statute.