



## **Ginsburg Financial Advisors, Inc.**

*Personal Financial Planning & Investment Management*

**Larry P. Ginsburg, CFP<sup>®</sup>**

**Adele Ostomel, CFP<sup>®</sup>**

phone: (510) 339-3933

fax: (510) 339-1611

[LGinsburg@GinsburgAdvisors.com](mailto:LGinsburg@GinsburgAdvisors.com)

[Aostomel@GinsburgAdvisors.com](mailto:Aostomel@GinsburgAdvisors.com)

### **At Ginsburg Financial Advisors, Inc. We Respect Your Privacy**

This Privacy Notice is being sent on behalf of Ginsburg Financial Advisors, Inc. and its Investment Advisory Representatives (collectively called "GFA").

We recognize our obligation to keep information about you, our client, secure and confidential. It is important for you to know that we do not sell your information to anyone. We restrict access to non-public personal information about you to those Investment Advisory Representatives and employees who need to know that information to provide services to you. We also maintain physical, electronic, and procedural safeguards to guard your Non-Public Personal Information ("NPPI"). This notice describes how we handle your financial information that we collect while conducting our business.

We collect NPPI about you (such as your name, address, Social Security or Tax Identification Number, assets, income and bank information) from our discussions with you, and from documents that you may deliver to us in the course of our providing services to you. We may use this information to open accounts for you or to process transactions for your accounts. In order to assist you in managing your accounts and to effect your transactions, we may provide your personal information to firms, such as a custodial broker-dealer, mutual fund company or other companies taking custody of your investment capital or assets so that those companies may assist us in servicing your account. These companies legally have a need and requirement under the US Patriot Act for such information as permitted by law. We may also disclose such information to the Securities & Exchange Commission ("SEC"), or the Financial Industry Regulatory Authority ("FINRA"), the regulatory agencies that oversee our professional business activities on behalf of our clients.

Some of GFA's Investment Advisory Representatives independently provide insurance, securities brokerage and other services to you. All of the information that GFA collects through its Investment Advisory Representatives who are also employed in other insurance or securities brokerage businesses will be available to them in those other business capacities. Investment Advisory Representatives will not disclose the information used in any capacity other than the one in which you have dealt with the Investment Advisory Representative for investment advisory services and with GFA in their assistance with your insurance or securities business.

If you prefer that we not disclose NPPI about you to non-affiliated third parties, (other than those disclosures permitted by law) or to GFA Investment Advisory Representatives for use in their other insurance and securities businesses, you may opt out of those disclosures. You may direct us not to make such disclosures. If you wish to opt out of disclosures to non-affiliated third parties, you may so instruct us in writing at the following address:

Larry P. Ginsburg, CFP®  
Ginsburg Financial Advisors, Inc.  
6201 Medau Place, Suite 101  
Oakland, CA 94611

### **United States Patriot Act Requirements When Opening a New Account**

To help the government fight the funding of terrorism and money laundering activities, Federal law (The U.S. Patriot Act) requires all financial institutions to obtain, verify and record information that identifies each person who or entity that opens an account.

When you engage our company for services, we must ask for your name, address, date of birth, Social Security Number or employer Tax Identification Number, and other information that will allow us to identify you and/or your entity. We will also ask to see and must make copies of the following for our records: your driver's license or state issued Identification Card, US Passport, or other identifying documents that contain your photograph, in addition to your Social Security Card. Or, for entity clients, we must request formation documents for company verification along with the necessary documents verifying the identities of those authorized to conduct business for the entity.

Over time as the documents you originally presented to us verifying your identity expire, we are required to obtain copies of the updated replacement documents.

### **Disaster Preparedness & Business Continuity Plan**

GFA has developed a Business Continuity Plan detailing how we will respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions is unpredictable, we will have to be flexible in responding to actual events as they occur. With that in mind, we are providing you with this information on our business continuity plan.

**Our Business Continuity Plan:** We plan to quickly recover and resume business operations after a significant business disruption and respond by safeguarding our employees and property, making a financial and operational assessment, protecting the firm's books and records, and allowing our customers to transact business. In short, our business continuity plan is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption.

**Contacting Us –** If after a significant business disruption you cannot contact us as you usually do you should call one of our alternative telephone numbers:

*“Helping You Shape Your Financial Future Since 1981”*

Ginsburg Financial Advisors, Inc. – A Registered Investment Advisor  
Securities through Cetera Advisor Networks LLC\* – Member FINRA/ SIPC  
(\*doing business in California as CFGAN Insurance Agency)  
Ginsburg Financial Advisors, Inc. and Cetera Advisor Networks LLC are separate companies  
Larry P. Ginsburg, CFP® – California Insurance License #0698190  
**6201 Medau Place, Suite 101, Oakland, CA 94611**

	<b><u>Mobile Phone</u></b>
Larry P. Ginsburg, CFP®, President	(510) 913-1907
Adele Ostomel, CFP®, Senior Client Advisor	(925) 200-6976
Jack Bellamy, CFA, CFP®, Director of Investment Management	(415) 823-2904
Diane Garcia, Office Manager	(510) 710-1536

### **Code of Ethics**

GFA has adopted a Code of Ethics (the “Code”) which covers its employees, Investment Advisory Representatives and the registered and non-registered assistants of its Investment Advisory Representatives (“Covered Persons”). The Code requires that all Covered Persons conduct all business dealings in an ethical fashion, and encourages all Covered Persons to meet not only the technical requirements of the Code but also its spirit. Under the Code, Covered Persons have an affirmative duty of care, loyalty and honesty and must act in the best interests of their clients.

GFA’s Code requires Covered Persons to comply with all federal securities laws. In addition, Covered Persons are prohibited from defrauding, misleading, or manipulating a client in any way in connection with the purchase or sale of a security. Further, Covered Persons may not favor the interests of one client over another. In the course of normal business, Covered Persons may receive confidential information concerning clients and potential clients. The general rule, as discussed in the Code is that this information should never be communicated to anyone other than Investment Advisory Representatives, assistants, and employees of GFA who need to know, and where appropriate, to the participants involved in a specific transaction.

The Code has strict guidelines regarding personal securities transactions, designed to ensure that Covered Persons are not misusing their inside positions at clients’ expense. Covered Persons are specifically prohibited from profiting personally, directly or indirectly, as a result of knowledge about a security or transactions. To enable GFA to monitor compliance with the Code, GFA requires that Covered Persons provide GFA with duplicate copies of confirmations and statements for their investment accounts held at other financial institutions. These confirmations and statements are then reviewed by GFA’s Chief Compliance Officer (currently, Larry P. Ginsburg, CFP®, GFA’s President). A copy of the Code of Ethics is available to clients upon request.

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