

1. Introduction

- **1.1** We are committed to safeguarding the privacy of our website visitors; in this policy we explain how we will treat your personal information. As a user of our website your privacy is important to us. We are dedicated to safeguarding your personal and financial information. We restrict access to confidential personal information about you to those employees who need to know that information to provide products or services to you. We maintain physical, electronic, and procedural safeguards to comply with federal standards to guard your confidential personal information.

2. Collecting personal information

- **2.1** We may collect, store and use the following kinds of personal information:
 - **(a)** information about your computer and about your visits to and use of this website (including your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation path);
 - **(b)** information that you provide to us when registering with our website (including your email address);
 - **(c)** information that you provide when completing your profile on our website (including, but not limited to, your name, email address, phone number);
 - **(d)** information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters or other notifications (including your name and email address);
 - **(e)** information that you provide to us when using the services on our website, or that is generated in the course of the use of those services;
 - **(f)** information that you post to our website for publication on the internet (including your user name, your profile pictures and the content of your posts);
 - **(g)** information contained in or relating to any communications that you send to us or send through our website (including, but not limited to, the communication content and meta data associated with the communication); and
 - **(h)** any and all other personally identifiable private information, including but not limited to names, address, age, social security number, assets, income, net-worth, account balances, account numbers, beneficiary information, investment history or any other information that you may disclose to us or our affiliated agents and companies.
- **2.2** Before you disclose to us the personal information of another person, you must obtain that person's consent to both the disclosure and the processing of that personal information in accordance with this policy.

3. Using your personal information

- **3.1** Personal information submitted to us through our website will be used for the purposes specified in this policy or on the relevant pages of the website.
- **3.2** We may use your personal information to:
 - **(a)** administer our website and business;
 - **(b)** contact you regarding our services described on our website;
 - **(c)** send you non-marketing commercial communications;
 - **(d)** send you email notifications that you have specifically requested;
 - **(e)** send you marketing communications relating to our business or the businesses of carefully-selected third parties which we think may be of interest to you, by post or, where you have specifically agreed to this, by email or similar technology (you can inform us at any time if you no longer require marketing communications);
 - **(f)** provide third parties with aggregate statistical information about our users (but those third parties will not be able to identify any individual user from that information);
 - **(g)** deal with inquiries and complaints made by or about you relating to our website;
 - **(h)** keep our website secure and prevent fraud;
 - **(i)** verify compliance with the terms and conditions governing the use of our website;
 - **(j)** to complete transactions or account changes, as directed by you;
 - **(k)** to maintain and/or service your account; and
 - **(l)** if required or permitted by law or regulatory authorities with jurisdiction.
- **3.3** If you submit personal information for publication on our website, we will publish and otherwise use that information in accordance with the license you grant to us.
- **3.4** We will not, without your express consent, supply your personal information to any third party for the purpose of their or any other third party's direct marketing.

4. Disclosing personal information

- **4.1** We may disclose your personal information to any of our employees, officers, insurers, professional advisers, agents, suppliers or subcontractors insofar as reasonably necessary for the purposes set out in this policy or to complete the services you have agreed to have us perform.
- **4.2** We may disclose your personal information to any member of our group of affiliated member companies (this means our subsidiaries, or other affiliated member companies) insofar as reasonably necessary for the purposes set out in this policy or to complete the services you have agreed to have us perform. These affiliated companies will adhere to the provisions of this Privacy Policy and shall keep your information confidential in a similar or same fashion as set out herein.
- **4.3** We may disclose your personal information:

- (a) to the extent that we are required to do so by law;
 - (b) in connection with any ongoing or prospective legal proceedings;
 - (c) in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk); and
 - (d) to provide the services you have agreed to have us perform.
- 4.4 Except as provided in this policy, we will not provide your personal information to third parties without your prior consent.

5. Retaining personal information

- 5.1 This Section 5 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal information.
- 5.2 Personal information that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- 5.3 Notwithstanding the other provisions of this Section 5, we will retain documents (including electronic documents) containing personal data:
 - (a) to the extent that we are required to do so by law;
 - (b) if we believe that the documents may be relevant to any ongoing or prospective legal proceedings; and
 - (c) in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk).
 - (d) to provide the services you have agreed to have us perform

6. Security of your personal information

- 6.1 We will take reasonable technical and organizational precautions to prevent the loss, misuse or alteration of your personal information.
- 6.2 We will store all the personal information you provide on our secure (password- and firewall-protected) servers.
- 6.3 You acknowledge that the transmission of information over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

7. Amendments

- 7.1 We may update this policy from time to time by publishing a new version on our website.
- 7.2 You should check this page occasionally to ensure you are happy with any changes to this policy.

8. Your rights

- **8.1** You may instruct us to provide you with any personal information we hold about you; provision of such information will be subject to:
 - **(a)** the payment of a fee; and
 - **(b)** the supply of appropriate evidence of your identity.
- **8.2** We may withhold personal information that you request to the extent permitted by law.
- **8.3** You may instruct us at any time not to process your personal information for marketing purposes.
- **8.4** In practice, you will usually either expressly agree in advance to our use of your personal information for marketing purposes, or we will provide you with an opportunity to opt out of the use of your personal information for marketing purposes.

9. Third party websites

- **9.1** Our website includes hyperlinks to, and details of, third party websites.
- **9.2** We have no control over, and are not responsible for, the privacy policies and practices of third parties. We encourage you to be aware when you leave our site and to read the privacy statements of each and every website that collects personally identifiable information. This privacy statement applies only to information collected by this website

10. Updating information

- **10.1** Please let us know if the personal information that we hold about you needs to be corrected or updated.

11. Our details

- **11.1** This website is owned by Anselmo & Company, LLC and operated by Gradient Financial Group, LLC.
- **11.2** We are registered as an Ohio Limited Liability Company.
- **11.3** Our principal place of business is at 7123 Pearl Road, Suite 310, Middleburg Heights, Ohio 44130.
- **11.4** You can contact us by email at info@AnselmoLaw.com, by using our website contact form, or by telephone at (216) 485-1040.

12. Cookies

- **12.1** Anselmo & Company, LLC is not using cookies. However, Google Analytics, a web analysis service, may collect personal data while you are navigating on the website, such as cookie and usage data. Google Analytics utilizes this information to record and examine data, to deliver reports and stats on its activities, as well as share them with other Google services.
- **12.2** Google Analytics is a web analysis service provided by Google. Google utilizes the data collected to track and examine the use of www.AnselmoLaw.com, to prepare reports on its activities and share them with other Google services.
- **12.3** Google may use the data collected to contextualize and personalize the ads of its own advertising network.

13. Children Under the Age of 13

- **13.1** Our Website is not intended for children under 13 years of age. No one under age 13 may provide any personal information to or on the Website. We do not knowingly collect personal information from children under the age of 13. If you are under the age of 13, do not use or provide any information on this Website or on or through any of its features on the Website, make any purchases through the Website, use any of the interactive or public comment features of this Website or provide any information about yourself to us, including your name, address, telephone number, e-mail address or any screen name or user name you may use. If we learn we have collected or received personal information from a child under the age of 13 without verification of parental consent, we will delete that information.