

**FACTS****WHAT DOES SENTINEL BENEFITS & FINANCIAL GROUP 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. We collect this data in hopes that we may continue to offer you the products and services you need to help meet your investment objectives and to effect, administer or enforce transactions you authorize. We do not sell your information to anyone.

**What?**

Please read this notice carefully to understand what we do.

In order to provide you with individualized service, we collect certain public and nonpublic personal information about you. The types of personal information we collect depends on the product or service you have with us and may include:

- Name & Address
- Social Security Number and/or Taxpayer Identification Number
- Phone Number
- Date of Birth
- Assets, Income, Account Balance(s)
- Investment Activity
- Accounts at Other Institutions

When you are *no longer* our customer, we continue to share your information as described in this notice.

**How?**

All financial companies need to share customer's personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customer's personal information; the reasons Sentinel Benefits & Financial Group and its affiliates chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Sentinel Benefits & Financial Group share?	Can you limit this sharing?
<b>For our everyday business purposes—</b> such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
<b>For our marketing purposes—</b> to offer our products and services to you	Yes	No
<b>For joint marketing with other financial companies</b>	No	We don't share
<b>For our affiliates' everyday business purposes—</b> information about your transactions and experiences	Yes	No
<b>For our affiliates' everyday business purposes—</b> information about your creditworthiness	No	We don't share
<b>For nonaffiliates to market to you</b>	No	We don't share

**Questions?**

Call 888-600-4608 or go to [www.sentinelgroup.com](http://www.sentinelgroup.com)

Who we are	
Who is providing this notice?	<b>Sentinel Benefits &amp; Financial Group (“SBFG”)</b>
What we do	
<b>How does Sentinel Benefits &amp; Financial Group protect my personal information?</b>	You may rely on us to protect the personal and private information you have entrusted to us. Every precaution, in accordance with federal and state laws and regulations, is used to limit access to personal information about you to those employees who assist us in providing products and services to meet your needs. SBFG maintains internal physical, electronic, and procedural safeguards to protect personal information about you
<b>How does Sentinel Benefits &amp; Financial Group collect my personal information?</b>	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> <li>■ open an account or give us your income information</li> <li>■ tell us about your portfolio, fund your account, or make a contribution</li> <li>■ enter into an investment advisory contract</li> <li>■ we collect your personal information from others, such as credit bureaus, affiliates or other companies</li> </ul> <p>We collect this data in hopes that we may continue to offer you the products and services you need to help meet your investment objectives and to effect, administer or enforce transactions you authorize. We do not sell your information to anyone.</p>
<b>Why can't I limit all sharing?</b>	<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>If you do not want us to disclose this information about you please call us at 888-880-1330. Your request not to share this information will apply to all accounts with us, including any new accounts that you open after your original request.</p> <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>
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>■ Our affiliates include Focus Operating, LLC, Focus Client Solutions, LLC, Sentinel Securities Inc., Sentinel Pension Advisors Inc., Sentinel Insurance Agency Inc., and Sentinel Benefits Group. LLC.</li> </ul>
<b>Non-affiliates</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>■ Sentinel Benefits and Financial Group does not share with non-affiliates so they can market to you.</li> </ul>

<b>Joint Marketing</b>	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. <ul style="list-style-type: none"><li>■ Sentinel Benefits and Financial Group does not jointly market.</li></ul>
------------------------	---

**Other important information**

We are an affiliate of Focus Financial Partners, LLC and we and other affiliates of Focus share certain of your personal information with an unaffiliated third party for the purpose of aggregating it and providing summary information based on this data to our parent company Focus.

To protect your non-public personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.

Our policy about obtaining and disclosing non-public personal information may change from time to time. We will provide you notice of any material change to this policy before we implement the change.

**Contact Us**

You are encouraged to review this Notice regularly, as we may change it from time to time. If we make changes, we will notify you by revising the date at the top of the Notice and, in some cases, provide you with additional notice (such as adding a statement to our website homepage or sending you a notification).

If you have any questions about this Notice, please contact us at **888-600-4608**