



## Customer Information Privacy Principles

Like most industries today, the financial services industry is rapidly being shaped by technology, which is literally changing the way we do business. To be successful in this environment, we must continue to ensure that our customers are confident that we will manage their financial affairs expertly and confidentially.

Parker Financial LLC ("Parker") collects personal, private information from its clients in order to determine the client's specific investment goals and objectives, which will assist in determining how to adequately service the client account based on the services provided by Parker, as disclosed in Parker's Form ADV Part 2.

The safeguarding of customer information is an issue we take seriously, and we want to assure all of our customers that whenever information is collected and used, it is done so with discretion. To affirm our continuing commitment to the proper use of customer information, we have set forth the following Privacy Principles, which are designed to guide us in serving the privacy needs of our customers.

**Recognition of a Customer's Expectation of Privacy:** At Parker we believe the confidentiality and protection of customer information is one of our fundamental responsibilities. And while information is critical to providing quality service, we recognize that one of our most important assets is our customers' trust. Thus, the safekeeping of customer information is a priority for Parker.

**Use, Collection, and Retention of Customer Information:** Parker limits the use, collection, and retention of customer information to what we believe is necessary or useful to conduct our business, provide quality service, and offer products, services, and other opportunities that may be of interest to our customers. Information collected may include, but is not limited to: name, address, telephone number, and tax identification number, date of birth, employment status, annual income and net worth.

**Maintenance of Accurate Information:** Parker recognizes that it must maintain accurate customer records. The above referenced information is collected at the inception of your relationship with Parker. Therefore, Parker will contact you periodically to review your overall account holdings, and to ensure that personal/confidential information contained in your file is accurate. Parker also request that you review any information provided to you related to your advisory account, and notify Parker promptly on the discovery of erroneous information. Parker will respond to a comment/request to correct inaccurate information immediately.

**Limiting Employee Access to Information:** Access to personally identifiable customer information will be limited to those employees having a business reason to access such information. Employees are educated on the importance of maintaining the confidentiality of customer information and on these Privacy Principles. Because of the importance of these issues, all Parker employees are responsible for maintaining the confidentiality of customer information and employees who violate these Privacy Principles will be subject to disciplinary measures.

**Protection of Information via Established Security Procedures:** Parker recognizes that a fundamental element of maintaining effective customer privacy procedures is to provide reasonable protection against the unauthorized access to customer information. Therefore, Parker has established appropriate security standards and procedures to guard against any unauthorized access to customer information.

**Restrictions on the Disclosure of Customer Information:** When it comes to sharing customer information with unaffiliated companies, Parker places strict limits on who receives specific information about customer accounts and other personally identifiable data. Parker may share information with such companies if they provide a product or service that may benefit our customers. Whenever we do this, we carefully review the company and the product or service to make sure that it provides value to our customers.

We share the minimum amount of information necessary for that company to offer its product or service. We may also share information with unaffiliated companies that assist us in providing our products and services to our customers; in the normal course of our business (for example, with consumer reporting agencies and government agencies); when legally required or permitted in connection with fraud investigations and litigation; in connection with acquisitions and sales; and at the request or with the permission of a customer.

1. **Maintaining Customer Privacy in Business Relationships with Third Parties:** If we provide personally identifiable customer information to a third party with which we have a business relationship, we will insist that the third party keep such information confidential, consistent with the conduct of our business relationship.

2. **Disclosure of Privacy Principles to Customers:** Parker recognizes and respects the privacy expectations of our customers. We want our customers to understand our commitment to privacy in our use of customer information. As a result of our commitment, we have developed these Privacy Principles which are made readily available to our customers. Customers who have questions about these Privacy Principles or have a question about the privacy of their customer information should call Jason Parker at 360-337-2701.

These Privacy Principles apply to individuals, and we reserve the right to change these Privacy Principles, and any of the policies or procedures described above, at any time. Under such circumstances, we will provide you with an updated set of our policies, and will provide adequate time for you to opt out of any information sharing arrangement. These Privacy Principles are for general guidance and do not constitute a contract or create legal rights and do not modify or amend any agreements we have with our customers.

CLIENT SIGNATURE:

DATE: (Required)

CLIENT SIGNATURE: (If Joint Account)

DATE: (Required)

PARKER FINANCIAL, LLC

DATE: (Required)



# Code of Ethics

Our Code of Ethics establishes ideals for ethical conduct based on fundamental principles of openness, integrity, honesty & trust.

Our Code of Ethics is divided into two parts: Traits and Practices you should adhere to and those you must avoid.

## **I. Traits and practices you should adhere to (Best Practices)**

### **Integrity**

Integrity is the most important trait in earning and retaining client trust. We will not compromise our principles for any reason. Client interests will always be placed before our own interests. Good character is our most important asset.

### **Honesty**

Honesty & openness are the fundamental principles underlying our practice. We will always be truthful and candid with clients, and will never make promises we do not intend to keep.

### **Fairness**

We will perform our services that is fair to all, including clients, and other employees. We will always disclose conflicts of interests.

### **Competence**

We will seek to continually increase our professional skills and knowledge.

### **Confidentiality**

We will always respect the confidentiality of sensitive and non-public information, for both clients and former clients. Wherever possible, we will control access to such sensitive and non-public information.

### **Diligence**

We will always act with timeliness, patience and consistency. Knowledge and skills are not enough. They must be applied in a prompt and thorough manner.

### **Reporting Personal Securities & Holdings**

All access persons including spouse must periodically (no less than 30 days after quarter ends) report their securities transactions and holdings to our President who will review those reports, thus allowing him, and regulators, to identify improper trades or patterns of trading. Pre-clearance of all trades (including IPO's and private placements) by access persons is required. Initial Public Offerings and Private Placements MUST be approved in writing and will be kept on record for five years. Access persons must execute trades after all relevant clients have had the opportunity to purchase or sell, preferably one day later.

## **Educating Employees About our Code of Ethics**

We provide all employees with a copy of our Code of Ethics, and you, in turn, will acknowledge receipt of the Code and your full understanding of the Code.

## **II. Practices you must avoid**

### **Discrimination & Harassment**

We are committed to providing a work environment that is free of discrimination and harassment. We are an equal opportunity employer.

### **Financial Interests in Other Financial Service Firms**

Employees and their spouses may not have an interest in another financial firm if that interest may present a conflict of interest with that employee's duties to this firm.

### **Improper Gifts & Entertainment**

Supervised persons should not accept inappropriate gifts, favors, entertainment, special accommodations, or other things of material value that could influence their decision-making or make them feel beholden to a person or firm. Similarly, supervised persons should not offer gifts, favors, entertainment or other things of value that could be viewed as overly generous or aimed at influencing decision-making or making a client feel beholden to the firm or the supervised person.

No supervised person may receive any gift, service, or other thing of more than de minimis value of from any person or entity that does business with or on behalf of the adviser. No supervised person may give or offer any gift of more than de minimis value to existing clients, prospective clients, or any entity that does business with or on behalf of the adviser without written pre-approval by the CCO. The annual receipt of gifts from the same source valued at \$100.00 or less shall be considered de minimis. Additionally, the receipt of an occasional dinner, a ticket to a sporting event or the theater, or comparable entertainment also shall be considered to be of de minimis value if the person or entity providing the entertainment is present. All gifts, given and received, will be recorded in a log to be signed by the supervised person and the CCO and kept in the supervised person's file.

No supervised person may give or accept cash gifts or cash equivalents to or from a client, prospective client, or any entity that does business with or on behalf of the adviser.

Bribes and kickbacks are criminal acts, strictly prohibited by law. Supervised persons must not offer, give, solicit or receive any form of bribe or kickback

**Unsuitable Recommendations**

We will never recommend that a client purchase or sell a security or insurance product without having reasonable grounds to believe the recommendation is suitable for the client on the basis of information provided by the client and after reasonable inquiry into the client's investment objectives and financial situation.

**Illegal Orders**

We will never purchase or sell a security that is not registered under applicable state or federal securities laws, unless such securities are legally exempt from registration.

**Borrowing Money**

We will never borrow money or securities from a client or lend money or securities to a client.

**Churning**

We will never excessively trade client accounts in order to generate sales commissions.

**Discretion**

We will never exercise discretionary authority over a client account without the express written authorization to do so by the client.

**False or Misleading Advertising**

We will always accurately describe the identity of the firm and the nature of the services offered by the firm.