**Contour Financials Disclosure and Policy - 2024**

As there are rules for any sport, firms likewise have rules by which they must abide. Instead of protecting the players however, these rules are laid out to protect the client.

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**1-Code of Ethics**

The Code of Ethics for Contour Financial, Inc. is found on the Form ADV Part II.

**2-Privacy Statement**

Contour Financial, Inc., an independent financial planning and Registered Investment Advisor firm, is committed to safeguarding the confidential information of its clients. We hold all personal information provided to our firm in the strictest confidence. These records include all personal information that we collect in connection with any of the services provided by Contour Financial, Inc. We have never disclosed information to nonaffiliated third parties, except as permitted by law, and do not anticipate doing so in the future. If we were to anticipate such a change in firm policy, we would be prohibited under the law from doing so without advising the client first. We use health and financial information to help the individual meet personal financial goals while guarding against any real or perceived infringements of privacy. Our policy with respect to personal information is listed below.

1. We limit employee and agent access to information only to those who have a business or professional reason for knowing, and only to nonaffiliated parties as permitted by law. (For example, federal regulations permit us to share a limited amount of information with a brokerage firm in order to execute securities transactions on a client’s behalf, or so that our firm can discuss a financial situation with a client’s accountant or lawyer.)
2. We maintain a secure office and computer environment to ensure that information is not placed at unreasonable risk.
3. The categories of nonpublic personal information that we collect from a client depend upon the scope of the client engagement. It will include information about personal finances, information about health to the extent that it is needed for the planning process, information about transactions between the client and third parties, and information from consumer reporting agencies.
4. For unaffiliated third parties that require access to personal information, including financial service companies, consultants, and auditors, we also require strict confidentiality in our agreements with them and expect them to keep this information private. Federal and state regulators also may review firm records as permitted under law.
5. We do not provide personal identifiable information to mailing list vendors or solicitors for any purpose.
6. Personally, identifiable information will be maintained during the time an individual is a client, and for the required time thereafter that such records are required to be maintained by federal and state securities laws. After this required period of record retention, all such information will be destroyed.
7. Any employee that leaves the employment of Contour Financial shall not take or disclose any information to any person, firm, corporation or association or any other entity for any reason.

**3-Insider Trading**

Contour Financial, Inc. forbids any officer, director, or employee from:

1. Trading in any security, either personally or beneficially at a time when that person has knowledge of material, non-public information concerning the issuer of a security.
2. Communicating such material non-public information to others in violation of the law.

These activities described above are frequently referred to as insider trading. To reduce the possibility of insider trading, all stock trades of both the clients and employees of Contour Financial must be approved by Cindy Menker. Written records will always be maintained. Both clients and employees will have their transactions logged in the back-office computer system.

This policy applies to every covered person and extends to activities within and outside their duties at Contour Financial, Inc. If an employee engages in insider trading activity, he may be liable to civil and/or criminal penalties, along with dismissal from the firm. Every covered person must read and sign this policy statement.

**4-Money Laundering**

Contour Financial is a reputable firm, and requires the same from its employees and clients. Money laundering may be defined as “The process whereby criminals conceal illicitly acquired funds by converting them into seemingly legitimate income. While the term refers to the proceeds of organized crime generally, it is now most often associated with financial activities of drug dealers who seek to launder the large amounts of cash generated from the sale of narcotics.”

How can employees of Contour Financial detect such illicit funds? We take the time to get to know the client. As comprehensive financial planners that create retirement projections, do tax planning and create client tax returns, we are in a good position to spot money laundering activities. All employees are expected to be alert and report any irregularities to the proper legal authorities. In signing this policy, the employees of Contour Financial pledge to be watchful against money laundering activities and not accept any suspect funds until cleared by the requisite government authorities.

**5-Cyber Security**

Contour Financial takes the security of client data quite seriously. What procedures does the firm use:

1. Periodic review that strong passwords are used.
2. Periodic review that passwords are not repeated.
3. Software updates done automatically but verified on a scheduled periodic basis.
4. Use of anti-virus software on all devices which is updated automatically.
5. Use of encryption on all sensitive documents.
6. Tight control of all devices that can be remotely disabled.
7. Periodic review that all equipment such as routers, firewalls and access points are up to date and have recent software patches.
8. Ensure that all wireless connections are encrypted.
9. Remains up to date on current threats and trends in cyber security.
10. Use of two-factor authorization and authenticators whenever possible.
11. Client transfers of funds through third-party entities that require approval by Contour Financial will only be confirmed through oral authorization of client with an employee at Contour Financial.
12. Contour Financial also has a cyber insurance policy in place.

**6-Social Media**

Social media consists of Facebook, Linked In, Google +, Twitter, etc. These sites can take two forms:

1. *Contour Financial Sites* – The firm may decide to use sites such as those mentioned above for these purposes:
	1. Educate current clients as to changes in the financial field and explain how they may be personally affected.
	2. Learn as to what issues are trending for both current and prospective clients. On the opposite side, learn what topics and therefore services may not be of interest anymore.
	3. Prospect for new potential clients.

Of concern for social media sites is the *Security and Exchange Commission’s (SEC)* rule *206(4)-1* of the *Investment Advisors Act of 1940.* This law states that an advisor may not obtain testimonials and use them in any advertising, either directly or indirectly.

To follow this this law, Contour Financial and the employees thereof will not solicit any testimonials. What active clients, prospective clients and the general public do on their social media sites can’t be controlled by either Contour Financial or the employees of the firm. To get active clients, prospective clients and the general public to delete entries from their social media sites would be an invasion of their personal privacy.

Privacy concerns do not absolve Contour Financial and its employees from the testimonial rule. The firm and its employees pledge therefore to never solicit testimonials. Any testimonials seen on someone’s social media sites as to Contour Financial and/or the firm’s employees are therefore unsolicited.

1. *Personal Sites of Contour Financial Employees* – As with the case of active clients, prospective clients and the general public discussed above, Contour Financial employees have similar personal privacy protections. Employee social media sites may not be subject to direct employer oversight, often time through state laws.

Privacy concerns do not absolve the firm’s employees from the testimonial rule, and the firm’s employees pledge to never solicit testimonials. Any testimonials seen on the employee’s personal social media sites are therefore unsolicited.

**7-Disaster Recovery**

Fires, tornados and floods are a few examples of unfortunate events that can affect a business. What would happen if our office was destroyed tomorrow?

First, since Contour Financial does not hold any investments physically in our office as they are held at Charles Schwab (800-515-2157), there is no concern that a client’s actual investments would be lost.

Second, almost all of our resources are now cloud-based. The data is located at various secure data centers. If our building were destroyed, these companies and data centers would still be going strong. These vendors include Charles Schwab, our financial & investment planning software, back-office reporting capabilities, research sources, and the cloud service that holds client folders, company documents, and e-mails.

Third, Contour Financial has established a Business Continuity plan and named a “continuity partner” to manage near-term disruptions in Contour Financial’s business and in case of the disability of Cynthia Menker or Egon Menker.

In addition to being offsite, all data is backed up again to another Internet site, as well as a copy stored at the office. Our office has an alarm system that is centrally monitored. The door to the office has two locks. We promise to stay current with new technological developments in this area as they occur.

**8-Record Storage**

The amount of paperwork in a client relationship is significant. What is the policy that Contour Financial has regarding the management of paperwork?

1. *Prospecting client with verbal communication –* Contour Financial does not tape record any face-to-face meetings or telephone conversations with the client. To keep any information from “falling through the cracks”, the financial planner may take notes to assist the planning process. These records are then considered written communication for record storage purposes.
2. *Prospecting client with written communication –* Physical and electronic records are kept until one of two events occur:
	1. The client signs a financial planning or investment management contract. As an active client, refer to point four.
	2. If a period of six months has passed without communication from a potential client, all original paperwork will be returned to the individual and contact information eliminated from the database.
3. *Verbal communications with an active client –* Client logs are maintained in the client’s electronic file. This may consist of face-to-face and telephone conversations.
4. *Written communications with an active client –* The Securities & Exchange Commission (SEC) states that written records should be maintained for five years. The governmental agency requires that we keep every written piece of information relating to the client whether it is letters, emails, faxes, statements, client logs or other paperwork that we either provided to the client or they gave to us.
5. *Records pertaining to an active client –* Likewise for five years any contracts, account forms, statements, proof of discretionary (ability to trade on client’s behalf) authority, Form ADV II, financial and investment plans generated, and complaints (if any) are saved.
6. *General Business Records –* Contour Financial must also maintain for five years general business records pertaining to the firm itself. Examples would be journals, financial statements, security purchase records, paid and unpaid bills, bank records, marketing materials, website changes, and client lists.

Contour Financial is a paperless office. All written documents that we receive are scanned into the computer. Originals are returned; copies are shredded. We will maintain the active client’s file until five years have passed since the client relationship has terminated. At Contour Financial we realize that record storage is very important. The employees pledge to enforce the policy as presented above.

**9-Annual Review**

Contour Financial has an annual review that is held at the end of each year to ensure that everything is in place for the year to follow. This is completed by Egon Menker, who is the Chief Compliance officer for the firm. The following tasks are completed:

1. Review the firm’swebsite to make sure that it is current and the information is in compliance.
2. Verify that the ADV Part I is updated on the IARD system, and made sure that all other miscellaneous government compliance tasks in this regard have been done.
3. Check to see that the ADV Part II has been updated with current information has been sent to all clients after approved by the State of Illinois.
4. Ensure that this document has been sent to all clients.
5. Study the company’s financial statements.
6. Ensure that employee trading transactions are free from irregular trading.
7. See that all correspondence, emails, reports, and other such documents are being archived as required.
8. Establish that fees are calculated properly.
9. Determine that all advertisements and brochures are compliant.
10. Inform all Contour Financial employees to any changes that have been made and ensure that they are followed for the upcoming year.

I, Egon Menker, attest that the firm and its employees have completed an “Annual Review” as outlined above, and that the firm is in compliance for the next twelve months. As employees, we attest that we are familiar with the policies and disclosures of Contour Financial

Cindy Menker Karen Nordstrom Egon Menker

President Financial Planner Chief Compliance Officer