

# **WBH FINANCIAL SERVICES, LLC**

## **OREGON IDENTITY THEFT PROTECTION ACT (“OITPA”) PROCEDURES**

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These Oregon Identity Theft Protection Act (“OITPA”) procedures of WBH Financial Services, LLC (“Advisor”) are designed to protect its client’s from identity theft.

### **Purpose of Procedures**

These procedures are designed to:

1. Establish procedures to protect social security numbers;
2. Establish procedures to notify clients of a material security breach; and
3. Establish safeguards to protect personal information.

### **Procedures for protecting social security numbers**

Excepting records that are required by law to be made available to the public, Advisor will:

- Prohibit the public display or disclosure of more than the last four digits of a social security number; and
- Refrain from printing Social Security numbers on cards or documents that are mailed, unless the client has requested information that requires a SSN.
  - This prohibition does not apply to the use of social security numbers for internal verification or administrative purposes.

### **Procedures to notify clients of a material security breach**

In the event of a security breach which materially compromises that personal information. Advisor will, without unreasonable delay (but consistent with the needs and investigation of law enforcement) either: (i) telephone if the affected individual directly, or (ii) email the affected individual if that is the customary method of communication between the Advisor and the Client. The notice will contain the following information:

1. A general description of the incident;
2. The approximate date of the breach;
3. The type of personal information compromised by the breach;
4. Contact information for the Advisor;
5. Contact information for national consumer reporting agencies, and
6. Advice on how to report suspected identity theft to law enforcement.

Personal information includes (but is not limited to) social security numbers, driver's license numbers, passport numbers, as well as financial, credit or debit card numbers in combination with a security code or password that would allow access to such.

Notification may be delayed if a law enforcement agency determines that notification will impede a criminal investigation *and* the agency has made a written request that notification be delayed.

Notification is not required if the Advisor determines, after an appropriate investigation or after consultation with relevant law enforcement, that no reasonable likelihood of harm to the client has resulted or will result from the breach. Any such determination by Advisor will be documented in writing and maintained for five years.

### **Safeguarding Personal Information**

Advisor will implement the following safeguards to protect the personal information of clients:

- Place documents with confidential information in locked file cabinets;
- Adopt and maintain document-retention schedules so that confidential information is regularly destroyed when no longer needed;
- Dispose of personal information after it is no longer needed by burning, pulverizing, shredding, or modifying a physical record and by destroying or erasing electronic media so that the information cannot be read or reconstructed;
- Select service providers capable of maintaining appropriate safeguards; make sure that all vendor contracts identify procedures for security in the contract;
- Assess risks in information processing, transmission, and storage; make sure electronic information is password-protected; and
- Regularly test and monitor the effectiveness of controls and procedures.

Wm. Brent Hamilton, the sole owner and Officer of WBH Financial Services, LLC, shall have the overall responsibility for the OITPA Procedures and the Advisor's compliance with the Procedures. Mr. Hamilton shall implement, or cause to be implemented, the notification procedures and safeguards described above.