

Item 1 Cover Page

Financial Scaffolding Form ADV Part 2A – Disclosure Brochure September 2023

This Disclosure Brochure provides information about the qualifications and business practices of Financial Scaffolding. If you have any questions about the contents of this Disclosure Brochure, please contact us at (734) 450-5711.

Financial Scaffolding is a Registered Investment Advisor with the U.S. Securities and Exchange Commission (“SEC”). Registration of an Investment Advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about FINANCIAL SCAFFOLDING to assist you in determining whether to retain the Advisor.

Additional information about Financial Scaffolding and its advisory persons are available on the SEC’s website at www.adviserinfo.sec.gov.

Financial Scaffolding, LLC
CRD #:328270

Mailing Address

1400 Village Square Blvd
PO Box 3-80414
Tallahassee, FL 32312

Physical Address

B505 Purva Venezia
Major Sandeep Unnikrishnana Rd.
Yelahanka, Bangalore, Karnataka
560064 India

Item 2 – Material Changes

This is our first ADV submission and therefore, there have been no material changes made to this disclosure brochure.

Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about advisory personnel of FINANCIAL SCAFFOLDING.

FINANCIAL SCAFFOLDING believes that communication and transparency are the foundation of our relationship and continually strive to provide our Clients with the complete and accurate information at all times. We encourage all current and prospective Clients to read this Disclosure Brochure and discuss any questions you may have with us. And of course, we always welcome your feedback. FINANCIAL SCAFFOLDING became registered as a Registered Investment Advisor in 2023.

Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of FINANCIAL SCAFFOLDING.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov. To review the firm information for FINANCIAL SCAFFOLDING:

- Click **Investment Advisor Search** in the left navigation menu.
- Select the option for **Investment Advisor Firm** and enter 328270 (our firm's CRD number) in the field labeled "Firm IARD/CRD Number".
- This will provide access to Form ADV Part 1 and Part 2.
- Item 11 of the ADV Part 1 lists legal and disciplinary questions regarding the Advisor.
- In the left navigation menu, Form ADV Part 2 is located near the bottom.

You may also request a copy of this Disclosure Brochure at any time, by contacting us at (734) 450-5711.

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Item 4 – Advisory Services

A. Firm Information

Financial Scaffolding (“FINANCIAL SCAFFOLDING” or the “Advisor”) is a Registered Investment Advisor with the US Securities & Exchange Commission, which is organized as a Limited Liability Company (LLC) under the laws of the State of Florida. FINANCIAL SCAFFOLDING was founded in June 2023 and is owned and operated by Kevin Nielsen. This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by FINANCIAL SCAFFOLDING.

B. Advisory Services Offered

Financial Planning and Consulting Services – FINANCIAL SCAFFOLDING provides advisory services in the form of financial planning services to individuals not affiliated with our Retirement Plan Sponsor clients. Financial planning services do not involve the active management of client accounts, but instead focuses on a client’s overall financial situation. Financial planning can be described as helping individuals determine and set their long-term financial goals, through investments, tax planning, asset allocation, risk management, retirement planning, and other areas. The role of a financial planner is to find ways to help the client understand his/her overall financial situation and help the client set financial objectives.

A financial plan developed for or financial consultation rendered to the Client will usually include general recommendations for a course of activity or specific actions to be taken by the Client. For example, recommendations may be made that the Client start or revise their investment programs, commence or alter retirement savings, establish education savings and/or charitable giving programs. FINANCIAL SCAFFOLDING may also refer Clients to an accountant, attorney or other specialist, as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of Client’s financial situation, observations, and recommendations. For consulting or ad-hoc engagements, the Advisor may not provide a written summary. Plans or consultations are typically completed within six months of contract date, assuming all information and documents requested are provided promptly. These can also be on an indefinite basis as well.

Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to effect the transaction through the Advisor.

C. Client Account Management

FINANCIAL SCAFFOLDING’s services are limited to providing investment advice only and not asset management services to Clients.

D. Wrap Fee Programs

FINANCIAL SCAFFOLDING does not manage or place Client assets into a wrap fee program. Investment management services are provided directly by FINANCIAL SCAFFOLDING.

E. Assets Under Management

FINANCIAL SCAFFOLDING does not actively manage client assets.

Item 5 – Fees and Compensation

The following paragraphs detail the fee structure and compensation methodology for investment management.

A. Fees and Billing for Advisory ServicesFinancial Planning and Consulting Services:

Financial Scaffolding is a fee-only financial planning and investment advisory firm. The client will pay us for financial planning service delivered, such as a retirement projection, asset allocation recommendations, fee assessment, insurance needs analysis, education funding review, etc. This will involve additional updates on a client's investment allocations as necessary, rebalancing suggestions, outreach to verify any modifications in their circumstance that affects their plan, and the ability for clients to contact us directly, at any time and as frequently as they would like to provide assistance with any questions they may have over the subsequent 12 months. The fee is \$200 for Investment Guidance and Financial Planning. This covers the first 12 months of guidance. We offer a money back guarantee for individual clients if they are not satisfied with our recommendations or guidance. They can request their money back by 60 days from their date of payment for the first year of guidance. Our clients purchase our service with credit or debit card and after the first 12 months it renews for \$7.50/month. We do not notify our clients prior to their 12 month renewal at \$7.50 a month. Clients can cancel their Financial Scaffolding guidance any time.

B. Fee Billing and Renewals

Clients purchase our guidance directly from our public website.

C. Other Fees and Expenses

Clients may incur certain fees or charges imposed by third parties, other than FINANCIAL SCAFFOLDING, in connection with investment made on behalf of the Client's account[s]. The Client is responsible for all custodial and securities execution fees charged by the custodian and executing broker dealer. The Investment Advisory Fee charged by FINANCIAL SCAFFOLDING is separate and distinct from these custodian and execution fees.

In addition, all fees paid to FINANCIAL SCAFFOLDING for investment advisory services are separate and distinct from the expenses charged by mutual funds and exchange-traded funds to their shareholders, if applicable, or any other investment security. These fees and expenses are described in each fund's or investment's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client could invest in these products directly, without the services of FINANCIAL SCAFFOLDING, but would not receive the services provided by FINANCIAL SCAFFOLDING which are designed, among other things, to assist the Client in determining which products or services are most appropriate to each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by FINANCIAL SCAFFOLDING to fully understand the total fees to be paid.

D. Compensation for Sales of Securities

FINANCIAL SCAFFOLDING does not buy or sell securities and does not receive any compensation for securities transactions in any Client account, other than the Investment Advisory Fees noted above.

Item 6 – Performance-Based Fees and Side-By-Side Management

FINANCIAL SCAFFOLDING does not charge performance-based fees for its investment advisory services. The fees charged by FINANCIAL SCAFFOLDING are as described in Item 5 – Fees and Compensation above are not based upon the capital appreciation of the funds or securities held by any Client.

FINANCIAL SCAFFOLDING does not manage any proprietary investment funds or limited Partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

Item 7 – Types of Clients

FINANCIAL SCAFFOLDING works with individuals for financial planning.

FINANCIAL SCAFFOLDING does not impose a minimum account size for establishing a relationship.

Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss

A. Methods of Analysis

FINANCIAL SCAFFOLDING primarily employs fundamental analysis methods in developing investment strategies for its Clients. Research and analysis from FINANCIAL SCAFFOLDING is derived from numerous sources, including financial media companies, third-party research

materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

As noted above, FINANCIAL SCAFFOLDING generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. FINANCIAL SCAFFOLDING also promotes using a simplified approach to investing with a heavy emphasis on using passive investments to help investors of all types broadly diversify their portfolios and reduce their management fees.

B. Risk of Loss

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the risk of loss. FINANCIAL SCAFFOLDING will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

Fundamental analysis utilizes economic and business indicators as investment selection criteria. These criteria are generally ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included in Item 13.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process. **Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor. For more information on our investment management services, please contact us at (734) 450-5711.**

Item 9 – Disciplinary Information

There are no legal, regulatory or disciplinary events involving FINANCIAL SCAFFOLDING or any of its employees. FINANCIAL SCAFFOLDING and its advisory personnel value the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider in which you Partner. Our backgrounds are on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov. To review the firm information contained in ADV Part 1, select the option for Investment Adviser Firm and enter 328270 in the field labeled “Firm IARD/CRD Number”. This will provide access to Form ADV Parts 1 and 2. Item 11 of the ADV Part 1 lists legal and disciplinary questions.

Item 10 – Other Financial Industry Activities and Affiliations

A. Broker Dealer Affiliation

Neither FINANCIAL SCAFFOLDING nor its advisory persons are registered, or have an application pending to register as a broker-dealer.

B. Other Affiliations

Neither FINANCIAL SCAFFOLDING nor its advisory persons are registered, or have an application pending to register, as a futures commission merchant (“FCM”), commodity pool operator (“CPO”), a commodity trading advisor (“CTA”), or an associated person of any such entity.

Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

A. Code of Ethics

FINANCIAL SCAFFOLDING has implemented a Code of Ethics that defines our fiduciary commitment to each Client. This Code of Ethics applies to all persons associated with FINANCIAL SCAFFOLDING. The Code of Ethics was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. FINANCIAL SCAFFOLDING and its personnel owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of FINANCIAL SCAFFOLDING associates to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code of Ethics covers a range of topics that may include; general ethical principles, reporting personal securities trading, reportable securities, initial public offerings and private placements, reporting ethical violations, distribution of the Code of Ethics, review and enforcement processes, amendments to Form ADV and supervisory procedures. FINANCIAL SCAFFOLDING has written its Code of Ethics to meet and exceed regulatory standards. To request a copy of our Code of Ethics, please contact us at (734) 450-5711.

B. Personal Trading with Material Interest

FINANCIAL SCAFFOLDING allows our employees to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. FINANCIAL SCAFFOLDING does not act as principal in any transactions. In addition, the Advisor does not act as the general Partner of a fund, or advice an investment company. FINANCIAL SCAFFOLDING does not have a material interest in any securities traded in Client accounts.

C. Personal Trading in Same Securities as Clients

FINANCIAL SCAFFOLDING allows our employees to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities we recommend (purchase or sell) to you presents a conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. As noted above, we have adopted, consistent with Section 204A of the Investment Advisers Act of 1940, a Code of Ethics, which addresses insider trading (material non-public information controls) and personal securities reporting procedures. We have also adopted written policies and procedures to detect the misuse of material, non-public information. We may have an interest or position in certain securities, which may also be recommended to you.

In addition, the Code of Ethics governs Gifts and Entertainment given by and provided to the Advisor, outside employment activities of employees, Employee reporting, sanctions for violations of the Code of Ethics, and records retention requirements for various aspects of the Code of Ethics.

D. Personal Trading at Same Time as Client

While FINANCIAL SCAFFOLDING allows our employees to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, at no time, will FINANCIAL SCAFFOLDING or any associated person of FINANCIAL SCAFFOLDING, transact in any security to the detriment of any Client.

Item 12 – Brokerage Practices

A. Recommendation of Custodian[s]

FINANCIAL SCAFFOLDING does not have discretionary authority to select the broker-dealer, custodian, administrator or trustee for custodial and execution services on behalf Client accounts. Where FINANCIAL SCAFFOLDING does not exercise discretion to select these providers, FINANCIAL SCAFFOLDING may recommend providers to Clients, as appropriate.

Following are additional details regarding the brokerage practices of the Advisor:

1. *Soft Dollars* - Soft dollars are revenue programs offered by broker-dealers whereby an advisor enters into an agreement to place security trades with the broker in exchange for research and other services. FINANCIAL SCAFFOLDING does not participate in soft dollar programs sponsored or offered by any broker-dealer.

2. *Brokerage Referrals* - FINANCIAL SCAFFOLDING does not receive any compensation from any third party in connection with the recommendation for establishing an account.

3. *Directed Brokerage* - Not all investment advisers require their clients to direct brokerage activity through any particular broker-dealer. FINANCIAL SCAFFOLDING does not routinely recommend, request, or require that Clients direct FINANCIAL SCAFFOLDING as to how to execute brokerage transactions for their accounts.

B. Aggregating and Allocating Trades

The Advisor does not aggregate Client orders.

Item 13 – Review of Accounts

A. Frequency of Reviews

Formal reviews are generally conducted at least annually or more or less frequently depending on the needs of the Client.

B. Causes for Reviews

In addition to the investment monitoring noted in Item 13.A., each Client account shall be reviewed at least annually. Reviews may be conducted more or less frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account. The Client is encouraged to notify FINANCIAL SCAFFOLDING if changes occur in his/her personal financial situation that might adversely affect his/her investment plan. Additional reviews may be triggered by material market, economic or political events.

C. Review Reports

The Client will receive brokerage or account statements no less than quarterly from the trustee or custodian. These statements are sent directly from the custodian to the Client. The Client may also establish electronic access to the custodian's website so that the Client may view these reports and their account activity. Client statements will include all positions, transactions and fees relating to the Client's account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

Item 14 - Client Referrals and Other Compensation

A. Compensation Received by FINANCIAL SCAFFOLDING

FINANCIAL SCAFFOLDING is a fee-only advisory firm, who, in all circumstances, is compensated solely by the Client. FINANCIAL SCAFFOLDING does not receive commissions or other compensation from product sponsors, broker dealers or any un-related third parties. FINANCIAL SCAFFOLDING may refer Clients to various third parties to provide certain financial services necessary to meet the goals of its Clients. Likewise, FINANCIAL SCAFFOLDING may receive referrals of new Clients from a third-party.

B. Client Referrals from Solicitors

FINANCIAL SCAFFOLDING does not engage paid solicitors for Client referrals.

Item 15 – Custody

FINANCIAL SCAFFOLDING does not accept or maintain custody of any Client accounts. All Clients must place their assets with a qualified custodian. FINANCIAL SCAFFOLDING Financial will recommend custodians and then clients select their own custodian to retain their funds and securities and direct FINANCIAL SCAFFOLDING to utilize that custodian for the Client's security transactions. FINANCIAL SCAFFOLDING encourages Clients to review statements provided by account custodian. For more information about custodians and brokerage practices, see Item 12 - Brokerage Practices.

Item 16 – Investment Discretion

FINANCIAL SCAFFOLDING does not accept investment discretion over the trading of client accounts

Item 17 – Voting Client Securities

FINANCIAL SCAFFOLDING does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting.

Item 18 – Financial Information

Neither FINANCIAL SCAFFOLDING, nor its management has any adverse financial situations that would reasonably impair the ability of FINANCIAL SCAFFOLDING to meet all obligations to its Clients. Neither FINANCIAL SCAFFOLDING, nor any of its advisory persons, has been subject to a bankruptcy or financial compromise. FINANCIAL SCAFFOLDING is not required to deliver a balance sheet along with this Brochure as the firm does not collect advance fees for services to be performed six months or more in advance.

Form ADV Part 2B – Brochure Supplement – Kevin Nielsen

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B505 Purva Venezia
Major Sandeep Unnikrishnana Rd.
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560064, India
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www.financial-scaffolding.com

This Brochure Supplement provides information about the background and qualifications of Kevin Nielsen in addition to the information contained in the Financial Scaffolding. (“FINANCIAL SCAFFOLDING” or the “Advisor” - CRD #7804815) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the FINANCIAL SCAFFOLDING Disclosure Brochure or this Brochure Supplement, please contact us at (734) 450-5711.

Additional information about Mr. Nielsen is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Kevin R Nielsen is Owner of Financial Scaffolding. Mr. Nielsen, born in 1978, is a dedicated Portfolio Manager for Client accounts of FINANCIAL SCAFFOLDING. Additional information regarding Mr. Nielsen's employment history is included below.

Employment History:

Owner, Financial Scaffolding	06/2023 to Present
International Educator, Various countries	01/2004 to Present

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Nielsen. Mr. Nielsen has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Nielsen. Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Nielsen. However, we do encourage you to independently view the background of Mr. Nielsen on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov. Select Investment Adviser Search from the left navigation menu. Then select the option for Investment Adviser Representative and enter 7804815 in the field labeled "Individual CRD Number".

Item 4 – Other Business Activities

Please see Item 10 of this Disclosure Brochure for details regarding Mr. Nielsen's other business activities.

Item 5 – Additional Compensation

Other than the fees detailed in Item 5 and Item 14 of this Disclosure Brochure, Mr. Nielsen receives no other compensation related to advisory services provided to clients.

Item 6 – Supervision

Mr. Nielsen serves as Owner and Chief Compliance Officer of FINANCIAL SCAFFOLDING. Mr. Nielsen can be reached at (734) 450-5711. FINANCIAL SCAFFOLDING has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of FINANCIAL SCAFFOLDING. Further, FINANCIAL SCAFFOLDING is subject to regulatory oversight by various agencies. These agencies require registration by FINANCIAL SCAFFOLDING and its employees. As a registered entity, FINANCIAL SCAFFOLDING is subject to examinations by regulators, which may be announced or

unannounced. FINANCIAL SCAFFOLDING is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Privacy Policy

Effective: September 1, 2023

Our Commitment to You

Financial Scaffolding ("FINANCIAL SCAFFOLDING") is committed to safeguarding the use of your personal information that we have as your Investment Advisor. FINANCIAL SCAFFOLDING (also referred to as "we", "our" and "us" throughout this notice) protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you. Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything we can to maintain that trust.

FINANCIAL SCAFFOLDING does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and proper business purposes in connection with the servicing and management of our relationship with you as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Privacy Policy.

Why you need to know?

Registered Investment Advisors ("RIAs") share some of your personal information. Federal and State laws give you the right to limit some of this sharing. Federal and State laws require RIAs to disclose how we collect, share, and protect your personal information.

What information do we collect from you?

Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number(s)	Income and expenses
E-mail address(es)	Investment activity
Account information (including other institutions)	Investment experience and goals

What sources do we collect information from in addition to you?	
Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

How we share your information?
RIAs do need to share personal information regarding its clients to effectively implement the RIA's services. In the section below, we list some reasons we may share your personal information.

Basis for sharing	Sharing	Limitations
Servicing our Clients We may share non-public personal information with non-affiliated third parties (such as brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed services to you consistent with applicable law, including but not limited to: <ul style="list-style-type: none"> • Processing transactions; • General account maintenance; • Responding to regulators or legal investigations; and credit reporting, etc.	FINANCIAL SCAFFOLDING may share this information.	Clients cannot limit the Advisors ability to share.
Administrators We may disclose your non-public personal information to companies we hire to help administrate our business. Companies we hire to provide services of this kind are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use	FINANCIAL SCAFFOLDING may share this information.	Clients cannot limit the Advisors ability to share.

of your personal information to the performance of the specific service we have requested.		
Marketing Purposes FINANCIAL SCAFFOLDING does not disclose, and does not intend to disclose, personal information with nonaffiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where FINANCIAL SCAFFOLDING or the client has a formal agreement with the financial institution. We will only share information for purposes of servicing your accounts, not for marketing purposes.	FINANCIAL SCAFFOLDING does not share personal information.	Clients cannot limit the Advisors ability to share.
Authorized Users In addition, your non-public personal information may also be disclosed to you and persons we believe to be your authorized agent or representative.	FINANCIAL SCAFFOLDING does share personal information.	Clients can limit the Advisors ability to share.
Information About Former Clients FINANCIAL SCAFFOLDING does not disclose, and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our clients.	FINANCIAL SCAFFOLDING does not share personal information regarding former clients	Clients can limit the Advisors ability to share.
How do we protect your information?		
To safeguard your personal information from unauthorized access and use, we maintain physical, procedural and electronic safeguards. These include computer safeguards such as passwords, secured files and buildings.		
Our employees are advised about FINANCIAL SCAFFOLDING's need to respect the confidentiality of each client's non-public personal information. We train our employees on their responsibilities.		
We require third parties that assist in providing our services to you to protect the personal information they receive. This includes contractual language in our third party agreements.		

Changes to our Privacy Policy.
We will send you notice of our Privacy Policy annually for as long as you maintain an ongoing relationship with us.
Periodically we may revise our Privacy Policy and will provide you with a revised policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

Questions: You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (734) 450-5711.
