



Privacy Policy

Effective October 14, 2026

1. Who we are and what this policy covers

BlueSky AML, LLC ("BlueSky," "we," "us") is a Georgia limited liability company that provides independent anti-money laundering (AML) testing to broker-dealers. This policy explains how we collect, use, share and protect personal information through our website, blueskyaml.com, through inquiries, and in the course of client engagements.

We do not sell personal information, and we do not use it for advertising.

2. Information we collect and why

Source	Information	How we use it
Website contact form	Name, firm, email address, phone number and your message	To respond to your inquiry and discuss a possible engagement
Website visits	Technical data such as IP address, browser type and pages requested, processed by our hosting provider	To deliver the website, protect it against abuse, and measure overall traffic with Cloudflare Web Analytics, which does not use cookies to track individual visitors.
Client engagements	Business contact details of client personnel, and signer name, email and IP address for electronic signatures	To administer the engagement, sign agreements, invoice and communicate
Client records	AML program records and a sample of customer account files, which may include customer names, addresses, dates of birth, taxpayer ID numbers, account numbers and identity documents	Solely to perform the independent AML test the client engaged us for (see Section 4)

3. How we share information

We share personal information only as follows:

- **Service providers** that help us operate, under confidentiality and security obligations: Content Snare (client document portal), Google Workspace (email and document storage), Web3Forms (website contact form), Zoho Sign (electronic signatures) and Cloudflare (website hosting).
- **Legal requirements:** when required by law, subpoena or regulatory request. Where permitted, we notify the affected client first.

- **With your consent** or at your direction.

We never sell, rent or trade personal information, or share it for targeted advertising.

4. Customer information we receive from clients

When we test a broker-dealer's AML program, we receive information about some of its customers. We handle that information on the client's behalf and only to perform the test. Specifically:

- We request only the sample and data fields each test step needs, and accept redacted copies where possible.
- Customer information is exchanged only through our encrypted client portal, never by email, and stays there: it is marked confidential so it cannot be viewed again through a client's link, and we review it in the portal without downloading it or copying it elsewhere.
- We delete customer information within 30 days after delivering the final report.
- We do not use customer information for any other purpose, share it with anyone other than the client except as required by law, or enter it into generative AI tools.

The broker-dealer's own privacy notice governs its relationship with its customers. Customers with questions about their information should contact their broker-dealer.

5. How long we keep information

Information	Retention
Contact form submissions held by Web3Forms	7 days (a copy is delivered to our email)
Inquiry and engagement correspondence	As long as needed for the business relationship, and for 6 years after an engagement ends
Final reports and workpapers (customer information removed)	6 years, so we can support clients in later regulatory examinations
Customer information received from clients	Deleted within 30 days after the final report is delivered

6. How we protect information

We maintain a Written Information Security Program with administrative, technical and physical safeguards, including multi-factor authentication on all of our accounts, encryption in transit and at rest, and certified cloud providers. Only our principal can access client information. If a breach affects a client's information, we notify that client within 72 hours of becoming aware of it. Our Information Security Summary and Incident Response Summary describe these safeguards in more detail.

7. Cookies

Our website does not use advertising or tracking cookies. We measure overall traffic (page views, referring sites, browser type and country) with Cloudflare Web Analytics, which is designed not to track individual visitors through cookies or fingerprinting. Our hosting provider may set strictly necessary cookies to protect the site from bots and abuse.

8. Your choices and rights

You may ask us to tell you what personal information we hold about you, or to correct or delete it, by emailing jack@blueskyaml.com. We will respond within 45 days. Depending on where you live, you may have additional rights under state privacy law, which we will honor as required. We may need to keep certain information where the law or our record-keeping obligations require it.

Requests about customer information received from a broker-dealer should go to that broker-dealer, and we will assist it in responding.

9. Other terms

- **Location:** Customer information we receive from clients is stored only in the United States. Our email and business documents are stored with Google, whose data centers may be located outside the United States.
- **Children:** our website and services are intended for businesses and are not directed to children under 13. We do not knowingly collect their information.
- **Other websites:** this policy does not cover websites we link to.
- **Changes:** we may update this policy and will post the new version with its effective date. Material changes affecting clients will be communicated directly.

10. Contact us

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