

Data Handling & Security Memo

One page, for your compliance file: how client information is protected in a Hornbeckco engagement.

1 • Anonymized data only — enforced at intake, not after

Hornbeckco does not accept identified client data. Before anything is sent, **the advisor removes names, Social Security numbers, dates of birth beyond month/year, account numbers, and addresses**. Initials, balances, and fact patterns are all that modeling requires. If an identified document arrives, it is deleted on receipt, the sender is notified, and the intake restarts clean — the risk moment is receipt, so anonymization is a precondition of the engagement, not a courtesy performed afterward.

2 • Transfer

Files move through an encrypted transfer link provided per engagement (or the advisor's own client vault, if preferred). No client documents by unencrypted email attachment.

3 • Processing

Work is performed by a single operator on a dedicated, disk-encrypted workstation. Analytical drafting is AI-assisted under commercial terms whose providers do not train models on submitted content; because intake is anonymized before it arrives, no personally identifiable client information enters any third-party tool at any step. Every load-bearing figure is then human-verified against its source document under a written QA rubric — the QA & methodology note in each packet describes exactly what was checked.

4 • Storage & retention

Engagement files live in a per-engagement encrypted folder for the duration of the work, are retained 30 days after delivery for revision support, then deleted — working files, intermediate outputs, and transfer-link contents included. Invoices and the engagement record (no client data) are retained for business records.

5 • Access & subcontracting

One person touches the file: the operator you engaged. No subcontractors, no offshore processing, no data resale, ever.

6 • Deliverables & the review firewall

Everything delivered is draft work product for **your** review — the packet, the facts ledger, and the math script travel back through the same encrypted channel, carry your branding, and are labeled “draft for advisor review, not advice to any client.” Advice-bearing items carry individual sign-off lines so your file shows an active decision on each one.

7 • Incident notification

Any suspected compromise of engagement data is reported to you within 72 hours with scope and remediation.

8 • Insurance

Professional liability (E&O) coverage, including AI-assisted work product, is bound before any paid engagement begins; certificate of insurance available on request.

Question your compliance department will ask	Short answer
Does the vendor receive PII?	No — anonymization is required pre-send; identified data is refused.
Where does the data live?	Encrypted transfer + dedicated encrypted workstation; deleted 30 days post-delivery.
Who has access?	One named operator. No subcontractors.
Is AI involved, and how?	Yes — drafting assistance on anonymized data under no-training commercial terms, with human verification of every load-bearing figure.
Who owns the advice?	The advisor. Every deliverable is a draft for advisor review with per-item sign-off lines.

Hornbeckco · Conway, SC · v1.0 — August 2026 · Happy to walk your compliance contact through any line of this memo.