

Portfolio Design Advisors, Inc. (“PDA”) values you as a customer and respects your right to privacy. We recognize that you have placed your trust in us, and we take the responsibility to preserve that trust. One way we endeavor to keep your trust is to properly handle that personal information. We pledge to you that:

- Protection of your privacy is a top priority;
- Your account information and all documents you provide to us are protected in a secure environment;
- We only collect personal information in order to accomplish our customer commitments to you;
- Information about you is only used and shared in limited and controlled ways; and,
- In the event that we wish to share information about you with non-affiliated third parties, you will be given options concerning what information may be shared and your privacy wishes will be respected. You may also choose to opt out of any information sharing.

PDA maintains physical, electronic, and procedural safeguards to ensure that personal information we have about you is treated responsibly, and in accordance with our privacy policy. We restrict access to information about you only to those representatives and employees who need to know that information in order to provide services to you or to conduct PDA’s business. Representatives or employees who have access to the information may only use it for legitimate business purposes. In addition, we take steps to safeguard information about you in accordance with applicable data security regulations.

We collect personal information about you from these sources:

- PDA’s Investment Management Agreement; and/or
- Custodian applications and forms, as a result of your relationship with us.

We collect the following types of personal information:

- Contact information and other personal identifiers, such as name, postal address, email address, phone number, social security number or tax identification number.
- Demographic and family information, such as date of birth, marital status, dependents, beneficiaries, citizenship and information about related parties to an account.
- Financial, professional and educational information such as investment objectives and experience, assets, income, expenses, net worth, tax status, holdings, transaction history, employment information and background.

We use personal information for the following purposes:

- Assisting in identifying you as our customer or our former customer;
- Offering and providing services, including opening accounts, communicating with you, and providing investment recommendations;
- Complying with applicable regulatory and legal requirements.

We may disclose the following categories of information to entities that perform administrative services on our behalf or as required or permitted by law for legal, regulatory, or other purposes:

- Information you provide directly to us on the Investment Management Agreement, applications or other forms; and/or,
- Information we receive about your transaction with us or with our custodians.

We may disclose information about you to:

- Our staff, affiliates, representatives, their affiliated businesses, and third parties who provide you with financial products and/or services.
- Nonaffiliated third parties which may include retirement plan sponsors or third party administrators, mutual fund companies, other broker-dealers, custodians, and clearing firms.

Our privacy policy is the same for current, as well as former clients. If you close your account, in the process of transferring your investments we may share your information with the new broker-dealer or custodian that you or your representative selects. If your representative servicing your account leaves us to join another firm, the representative is permitted to retain copies of your information so that he or she can continue to serve you at the new firm. The representative is still required to keep your personal information confidential and may only use it to service your account. If you wish to opt out of having your representative take your personal information upon leaving PDA, please send a written request to:

Portfolio Design Advisors, Inc.
Attention: Compliance Department
9055 E Mineral Circle, Suite 200
Centennial, CO 80112

California Residents:

The California Consumer Privacy Act (CCPA) provides California residents with rights to receive certain disclosures regarding the collection, use and sharing of “Personal Information” as well as rights to know/access, delete and limit sharing of “Personal Information”. As a financial services organization, much of the information we collect is exempt from the CCPA because it is covered by federal or state privacy laws, such as the Gramm-Leach-Bliley Act.

The CCPA defines Personal Information to mean “information that identifies, relates to, describes, is reasonably capable of being associated with or could reasonably be linked, directly or indirectly, with a particular consumer or household. We do not sell your Personal Information; however, as described in this policy, we do disclose information about you to third parties who provide you with financial products and services.

To the extent that we collect Personal Information that is subject to the CCPA, you have the right to request access to Personal Information we have collected about you in the preceding 12 months, the purposes for which we collected it and the categories of third parties with whom we shared it. Additionally, you have the right to request in certain circumstances that we delete any Personal Information that we have collected directly from you; however, there may be certain exceptions as defined in the CCPA that prevent or limit our ability to comply with your request.

To submit a request to exercise your right to access or delete your Personal Information under the CCPA, please call us at 877-335-7035. Or submit a written request to us at:

Portfolio Design Advisors, Inc.
Attention: Compliance – CCPA Request
9055 E Mineral Circle, Suite 200
Centennial, CO 80112

All requests are subject to a verification process. Requests by an authorized agent are subject to additional documentation requirements as described below.

Verification procedures – In order to process your request to access or delete Personal Information we collect; we must verify your request. We do this by request that you verify personal identifiers, such as your name, address, date of birth, and/or account number that we have previously collected from you.

Requests by Authorized Agent – You may authorize another individual or business to make requests on your behalf. We require that you provide legal documentation confirming the identity and authority of an authorized agent to act on your behalf. Such documentation may include but is not limited to, a power of attorney, court documents (letters of testamentary, guardianship documents), or notarized statements.

PDA pledges to work to protect the security of your confidential information.