



PORTFOLIO ADVISORS, INC.
PRIVACY NOTICE

Portfolio Advisors, Inc. (referred to as "PAI") maintains physical, electronic, and procedural safeguards that comply with federal standards to protect its clients' nonpublic personal information ("information"). Through this policy and its underlying procedures, PAI attempts to secure the confidentiality of customer records and information and protect against anticipated threats or hazards to the security or integrity of customer records and information.

It is the general policy of PAI to restrict access to all current and former clients' information (i.e., information and records pertaining to personal background, investment objectives, financial situation, tax information/returns, investment holdings, account numbers, account balances, etc.) to those employees and affiliated/nonaffiliated entities who need to know that information in order to provide products or services in furtherance of the client's engagement of PAI. In that regard, PAI may disclose the client's information: (1) to individuals and/or entities not affiliated with PAI, including, but not limited to the client's other professional advisors and/or certain service providers that may be recommended or engaged by PAI in furtherance of the client's engagement of PAI (i.e., attorney, accountant, insurance agent, broker-dealer, investment adviser, account custodian, record keeper, proxy management service provider, etc.); (2) as required to do so by judicial or regulatory process; or (3) as otherwise permitted to do so in accordance with the parameters of applicable federal and/or state privacy regulations.

For the avoidance of doubt, non-affiliates with which PAI may share information can include certain approved cloud-based data storage and management platforms and artificial intelligence tools and platforms for internal training, compliance monitoring, service delivery, and general administrative purposes. Information shared with these platforms can include, but is not limited to, screen or video recordings, documentation, or communications, as well as the information types described above. PAI only permits the submission of confidential client information to such platforms and tools when PAI confirms that the subject platform or tool will provide at least the same degree of confidentiality and protection to client information that PAI provides. Notwithstanding this, PAI generally attempts to limit and, where applicable, redact, sensitive client information that is submitted to these platforms and tools.

The disclosure of information contained in any document completed by the client for processing and/or transmittal by PAI to facilitate the commencement/continuation/termination of a business relationship between the client and/or between PAI and a nonaffiliated third party service provider (i.e., broker-dealer, investment adviser, account custodian, record keeper, insurance company, etc.), including, but not limited to, information contained in any document completed and/or executed by the client in furtherance of the client's engagement of PAI (i.e., advisory agreement, client information form, etc.), shall be deemed as having been automatically authorized by the client with respect to the corresponding nonaffiliated third party service provider.

PAI may also from time-to-time enter into office-sharing arrangements with unaffiliated third-parties. These arrangements permit approves third-parties and their guests and clients with access to PAI's office space. Although PAI does not proactively share client information with these third-parties, their access to PAI's office may inadvertently expose them to client information. PAI has adopted procedural, technical, and physical safeguards in an attempt to prevent access to and use of PAI client information by these third-parties. PAI also requires any such third-parties to enter into confidentiality agreements with PAI, providing at least the same protection to client information as would be received were the unaffiliated third-parties directly subject to PAI's Privacy Policy.

Except as discussed above, PAI permits only authorized employees and affiliates who have signed a copy of PAI's Privacy Policy to have access to client information. Employees violating PAI's Privacy Policy will be subject to PAI's disciplinary process. Additionally, whenever PAI hires other organizations to provide services to PAI's clients, PAI will require them to sign confidentiality agreements and/or the Privacy Policy.

Should you have any questions regarding the above, please contact Tina Mistry, Chief Compliance Officer.