

## PUBLIC TRUST ADVISORS, LLC PRIVACY POLICY

Last Updated: April 1, 2020

### Introduction

Protecting client information is of critical importance to Public Trust Advisors, LLC (Public Trust). The U.S. Securities and Exchange Commission has adopted Regulation S-P, Privacy of Consumer Financial Information, governing the treatment of non-public personal information about clients by brokers, dealers, and investment advisors. Regulation S-P requires financial institutions, including Public Trust, to provide notice to current clients and prospective clients about their policies and practices concerning the collection and use of client, non-public information. Public Trust has adopted the following privacy policy to protect the nonpublic personal information of its clients. This privacy policy notice is given to all prospective clients of Public Trust upon entering into an investment advisory agreement and annually thereafter.

**We value our clients' trust and confidence and want you to understand what information Public Trust obtains, how we use this information, and how it is protected.**

The purpose of a privacy policy is to provide administrative, technical, and physical safeguards that assist employees in maintaining the confidentiality of nonpublic personal information collected from the clients of an investment adviser. All nonpublic personal information, whether relating to an adviser's current or former clients, is subject to the privacy policy. Any doubts about the confidentiality of client information must be resolved in favor of confidentiality.

### Non-Disclosure of Client Information

Public Trust maintains safeguards to comply with federal and state standards to guard each client's nonpublic information. We do not share any nonpublic information with any nonaffiliated third parties except in the following circumstances:

- As necessary to provide the service that the client has requested or authorized or to maintain and service the client's account; and
- As required by regulatory authorities or law enforcement officials who have jurisdiction over the investment adviser or as otherwise required by any applicable state open records law; and
- To the extent reasonably necessary to prevent fraud and unauthorized transactions.

### What Information Public Trust Obtains

Public Trust has a duty to protect the nonpublic personal information of its clients and to disclose to such clients the policies and procedures for protecting that information. Nonpublic personal information includes nonpublic "personally identifiable financial information" plus any list, description, or grouping of customers that is derived from nonpublic personally identifiable financial information. Such information may include financial information about our clients, information relating to services

performed for or transactions entered into on behalf of clients, and data or analyses derived from such nonpublic personal information. Other information may include new account forms containing names, addresses, phone numbers, email addresses, custodial account information, and securities holdings information.

## How We Use the Information

We may share personal information we collect about our clients, prospects, and former clients to service providers such as:

- Unaffiliated service providers such as securities clearing houses, printers for delivery of statements, software firms, and other administrative services associated with your account(s).
- Government agencies such as state securities divisions, tax reporting, or court orders.
- Other organizations as permitted by law that protect your privacy such as fraud prevention.
- Our registered representative(s) who may be independent correspondents of Public Trust.

In most instances, Public Trust requires these unaffiliated service providers to execute non-disclosure agreements to further protect client nonpublic information.

## How it is Protected

Public Trust is committed to protecting nonpublic client information and considers this safeguarding of information a priority. We have adopted polices based on the National Institute of Standards and Technology (NIST) framework designed to prevent unauthorized access to our clients' information. Access to client information is restricted to Public Trust employees, registered representatives, and designated software service providers used for legitimate business purposes. Public Trust restricts access to nonpublic client information to only those employees and software service providers who need to know such information to provide services to our clients. Any employee or software vendor who is authorized to have access to nonpublic client information is required to keep such information in a secure compartment or receptacle as of the close of business each day. All electronic or computer files containing such information shall be password protected and secured behind a corporate firewall protected from access by unauthorized persons.

If you have any questions about the Public Trust Privacy Policy or concerns about any nonpublic personal information, please feel free to contact us at:

Public Trust Advisors, LLC  
Compliance Department  
717 17th Street, Suite 1850  
Denver, CO 80202  
(303) 295-0777  
[www.publictrustadvisors.com](http://www.publictrustadvisors.com)