

**Portland Investment Advisors, LLC**  
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**PRIVACY POLICY**

Investment advisers are required by law to inform their clients of their policies regarding privacy of client information. We are bound by professional standards of confidentiality that are even more stringent than those required by law. Federal law gives our customers the right to limit some but not all sharing of personal information. It also requires us to tell you how we collect, share, and protect your personal information.

**TYPES OF NONPUBLIC PERSONAL INFORMATION (NPI) WE COLLECT**

We collect nonpublic personal information about you that is either provided to us by you or obtained by us with your authorization. This can include but is not limited to your Social Security Number, Date of Birth, Banking Information and Financial Account Numbers and/or Balances, Sources of Income, Credit Card Numbers or Information. When you are no longer our customer, we may continue to share your information only as described in this notice.

**PARTIES TO WHOM WE DISCLOSE INFORMATION**

All Investment Advisers may need to share personal information to run their everyday business. In the section below, we list the reasons that we may share your personal information:

- For everyday business purposes – such as to process your transactions, maintain your account(s), or respond to court orders and legal investigations, or report to credit bureaus.
- For our marketing – to offer our products and services to you.

**PROTECTING THE CONFIDENTIALITY OF CURRENT AND FORMER CLIENT'S INFORMATION**

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law, including computer safeguards and secured files and building.

**FEDERAL LAW GIVES YOU THE RIGHT TO LIMIT SHARING – OPTING OUT**

Federal law allows you the right to limit the sharing of your NPI by “opting-out” of the following: sharing for affiliates’ everyday business purposes – information about your creditworthiness; sharing with affiliates who use your information to market to you; or sharing with non-affiliates to market to you. State laws and individual companies may give you additional rights to limit sharing. Please notify us immediately if you choose to opt out of these types of sharing.

**DEFINITIONS:** Affiliates – companies related by common ownership or control. They can be financial and nonfinancial companies; Non-affiliates – companies not related by common ownership or control. They can be financial and nonfinancial companies; Joint marketing – a formal agreement between non-affiliated financial companies that together market financial products or services to you