

PUBLIC TRUST ADVISORS, LLC PRIVACY POLICY

Last Updated: February 28, 2015

Introduction

Public Trust Advisors, LLC (“PTA”) dedicates itself to protecting customer information. We value your trust and want you to understand what information we obtain, how PTA uses this information, and how we protect it. PTA will not share non-public information about customers with third parties with the exception of the securities vendors we use to serve your securities brokerage needs, by law your registered representative(s) or others as further described below. We have created our Privacy Policy to communicate our privacy commitment to you.

- It is PTA’s policy not to sell personal information to outside marketers for payment or any other compensation.
- We will at all times maintain physical, electronic and procedural safeguards to protect customer/personal information we obtain.
- We will inform customers of our Privacy Policy annually and what changes, if any, are made.

As a registered investment advisor, PTA must comply with SEC Regulation S-P, which requires registered advisors to adopt policies and procedures to protect the "nonpublic personal information" customers and to disclose to such persons 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 personal financial and account information, information relating to services performed for or transactions entered into on behalf of clients, advice provided by PTA to clients, and data or analyses derived from such nonpublic personal information. In addition, the obligation for investment advisors such as PTA to maintain the absolute privacy of their clients and their clients’ information is addressed in the Gramm-Leach-Bliley Act Privacy Safeguards Rule, 16 CFR Part 314. In November 1999, Congress passed landmark legislation repealing Depression-era restrictions on cross-ownership between banks, insurance companies, and broker-dealers. Included in the Gramm-Leach-Bliley Act (the GLBA) was a separate chapter restricting the sharing of consumer information collected by financial institutions with third-party firms or vendors. Nearly all firms involved in the financial services industry are subject to the federal regulations, and many will be subject to future state privacy statutes and regulations. Federal privacy regulations issued pursuant to Title V of the GLBA became effective November 13, 2000, and require financial institutions to create a comprehensive privacy policy and send privacy notices annually to customers.

Overview

The GLBA requires "financial institutions" to protect the privacy of most information they obtain from individuals who use their products and services. The term "financial institution" is defined broadly. It includes investment advisors, broker-dealers, investment companies, and insurance agents and brokers. (References throughout this summary to investment advisors include financial planners.) Financial planning firms are not defined in the federal or state regulations, but nearly all planners with a comprehensive practice will be covered under these rules. Generally speaking, under the rules financial planning firms must: create a privacy program; provide privacy policy notices to their clients and prospective clients; provide clients and prospective clients with the ability to opt out from the disclosure of information to nonaffiliated third parties (with certain key exceptions); maintain appropriate additional records of the firm's privacy policy and related client communications for purposes of Securities and Exchange Commission (SEC) and state recordkeeping rules (if a registered investment advisor); and be prepared to deliver annually thereafter (not merely offer, as is permitted in the case of Part II of Form ADV) to clients the privacy policy and opt-out procedures.

In order to provide you with products and services you have requested for your securities brokerage account, PTA may receive non-public information about you from the following:

- New Account(s) forms containing name, address, phone number, social security number, birth date, income, net worth, bank reference, and employment.
- Transaction activity in your account(s) or outside companies such as mutual fund and insurance companies.
- Credit reporting agencies for verification of accuracy of application data and/or to access credit worthiness for credit products.
- From other sources, with your consent, for example transferring your account to PTA.
- From other companies to assist us in marketing our products and services we offer jointly with other financial companies, for example mutual fund companies and insurance companies.

How Your Information is Protected

PTA is committed to protecting your non-public information and considers this safeguarding of information a priority. We maintain procedures and technology designed to prevent access to your personal information. We employ physical, electronic, and procedural protections in accordance with industry standards.

We restrict access to personal information to employees, our registered representatives and service providers for legitimate business purposes. We may share personal information we collect about our customers, prospects and former customers to service providers such as:

- Unaffiliated service providers such as securities clearing houses, printers for delivery of statements and other administrative services associated with your account(s).
- Government agencies, such as tax reporting or court orders.
- Other organizations such as consumer reporting agencies.
- Other organizations, as permitted by law that protect your privacy such as fraud

- prevention.
- Our registered representative(s) who may be independent correspondents of PTA.

Use of Information By Your Registered Representative

We know that for many of our customers, their ongoing relationship with their registered representative is of major importance. Therefore, we permit our registered representatives to maintain his/her own database and file on his/her customers which may include you. These files may contain some or all of the same information, confidential or otherwise, we possess about you. We further permit our registered representatives to use this information in servicing your accounts(s) and to take this information with them and share it with a new, unaffiliated broker-dealer, should your registered representative end his/her registration/affiliation with PTA. We do this to enable former registered representatives to provide continued, uninterrupted service to you, our customer, should you desire to transfer your accounts to a new broker-dealer. If you wish to opt out of this information sharing arrangement with our registered representatives, please inform us either by writing to us at the address below or calling our Compliance Department at (303) 244-0469.

On-Line Privacy

In addition to the privacy guidelines outlined above, the following on-line principles describe PTA's commitment to protecting your information when accessing us through the World Wide Web. We employ proven protection such as: firewalls; encryption techniques; and authentication verification techniques.

Even if you are a former PTA customer, our Privacy Policy will continue to apply to you.

For More Information Please Contact:

Public Trust Advisors, LLC
Compliance Department
999 18th Street, Suite 1230
Denver, Colorado 80202
www.publictrustadvisors.com
1-855-395-3954