

## **Privacy Policy Notice**

At Private Portfolio, We recognize the importance of protecting your privacy and we have policies in place to maintain the confidentiality and security of your personal information. The following policy is designed to help you understand what information we collect from you and how we use that information to serve your account, working along with Pershing, our clearing firm.

### **Confidentially and Security**

We restrict access to nonpublic, personal information about you to those employees and agents who need to know that information to provide products or services to you. We maintain physical, electronic, and procedural safeguards to protect your nonpublic, personal information.

**Categories of information that Private Portfolio discloses and parties to who Private Portfolio discloses** We do not disclose any nonpublic, personal information about our clients or former clients to anyone else, except as permitted by law.

### **Categories of information that Private Portfolio collects**

We collect nonpublic, personal information about you from the following sources: Information we receive from you on applications or other forms. Information about your transactions with us, or others. Information we receive from a consumer reporting agency.

**Rule: SEC Regulation S-P**

## **Private Portfolio's Business Continuity Planning**

Private Portfolio, Inc has developed a Business Continuity Plan on how we will respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions is unpredictable, we will have to be flexible in responding to actual events as they occur. With that in mind, we are providing you with this information on our business continuity plan.

**Contacting Us** – If after a significant business disruption you cannot contact us as you usually do at 858-551-2071, you should call our alternative number 858-342-0891 or go to our website at [Privateportfolio.com](http://Privateportfolio.com). If you cannot access us through either of those means, you should contact our clearing firm, Pershing LLC, at 201-413-3635 or 213-624-6100 extension 500 [www.pershing.com](http://www.pershing.com) for instructions on how it may provide prompt access to funds and securities, enter orders and process other trade-related, cash and security transfer transactions for your customers.

**Our Business Continuity Plan** – We plan to quickly recover and resume business operations after a significant business disruption and respond by safeguarding our employees and property, making a financial and operational assessment, protecting the firm's books and records, and allowing our customers to transact business. In short, our business continuity plan is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption.

Our business continuity plan addresses: data backup and recovery; all mission critical systems; financial and operational assessments; alternative communications with

customers, employees, and regulators; alternate physical location of employees; critical supplier, contractor, bank and counter-party impact; regulatory reporting; and assuring our customers prompt access to their funds and securities if we are unable to continue our business.

Our clearing firm, Pershing LLC, backs up our important records in a geographically separate area. While every emergency situation poses unique problems based on external factors, such as time of day and the severity of the disruption, we have been advised by our clearing firm that its objective is to restore its own operations and be able to complete existing transactions and accept new transactions and payments within 4 hours. Your orders and requests for funds and securities could be delayed during this period.

**Varying Disruptions** – Significant business disruptions can vary in their scope, such as only our firm, a single building housing our firm, the business district where our firm is located, the city where we are located, or the whole region. Within each of these areas, the severity of the disruption can also vary from minimal to severe. In a disruption to only our firm or a building housing our firm, we will transfer our operations to a local site when needed and expect to recover and resume business within short period of time. In a disruption affecting our business district, city, or region, we will transfer our operations to a site outside of the affected area, and recover and resume business within short period of time. In either situation, we plan to continue in business, transfer operations to our clearing firm if necessary, and notify you through our website [privateportfolio.com](http://privateportfolio.com) our customer emergency number, 858-342-3000 how to contact us. If the significant business disruption is so severe that it prevents us from remaining in business, we will assure our customer's prompt access to their funds and securities.

**For more information** – If you have questions about our business continuity planning, you can contact us at 858-551-2071.

FINRA Rule 4370