

Public Trust Advisors Privacy Policy

Last Revised: March 1, 2022

Public Trust Advisors, LLC (“Public Trust,” “we,” or “us”) respects your privacy. This Privacy Policy describes the types of information we may collect from you when you visit www.publictrustadvisors.com or use our other products and services that include an authorized link to this Privacy Policy (collectively, the “Services”), how we use the information we collect, with whom we share it, how we protect it, and the choices we offer you regarding our collection and use of such information.

1. INFORMATION WE COLLECT

How We Collect Information. We may collect personal information about you, meaning information that can uniquely identify you, from various sources, such as:

- Directly from you when you use the Services, such as when you fill out a form or contact us via email;
- Social networks through which you may interact with us; and
- Our service providers, business partners and other third parties.

What Information We Collect. The personal information we collect about you may include, without limitation:

- Business contact information, such as name, email address, postal address and phone number.

Information We Collect Automatically. When you use the Services, we may also collect certain information by automated means, such as cookies. A “cookie” is a text file that websites send to a visitor’s computer or other Internet-connected device to uniquely identify the visitor’s browser or to store information or settings in the browser. We may also use third-party analytics tools (such as Google Analytics and Lucky Orange) that collect information about use of the Services and user traffic. The information we collect by automated means may include, without limitation:

- Information about the devices you use to access the Services (such as the IP address and the type of the device, operating system, and web browser);
- Dates, times, and duration of use of the Services; and
- Information on actions taken when using the Services (such as video views and website navigation patterns).

The information we collect automatically is statistical data and does not include personal information. It helps us to improve and personalize our Services, including by enabling us to identify and authenticate users.

2. HOW WE RESPOND TO DO NOT TRACK SIGNALS

Your web browser may let you choose your preference as to whether you want to allow the collection of information about your online activities over time and across different websites or online services. At this time, the Services do not respond to the preferences you may have set in your web browser regarding such collection of your information, and the Services may continue to collect information in the manner described in this Privacy Policy.

3. HOW WE USE THE INFORMATION WE COLLECT

We may use information we obtain about you to:

- Process orders you place and complete other transactions you have requested using the Services, and provide you with products and services you request;
- Send you information, reports or materials you request;
- Respond to your questions and comments and provide customer support;

- Communicate with you about our products, services, offers, and promotions;
- Operate, evaluate, and improve our business and the products and services we offer;
- Analyze trends and statistics regarding use of the Services and transactions conducted using the Services
- Protect against and prevent fraud, unauthorized transactions, claims, and other liabilities, and manage risk exposure, including by identifying potential hackers and other unauthorized users;
- Enforce our ([Terms and Conditions](#)) and other agreements;
- Comply with applicable legal requirements and industry standards.

We also may use the information we obtain about you in other ways for which we provide specific notice at the time of collection.

4. DISCLOSURE OF INFORMATION

We may disclose aggregated information about our users, and information that does not identify any individual user, without restriction. We may disclose personal information about you:

- To service providers and other third parties we use to support our business;
- To comply with any court order, law, or legal process, including to respond to any government or regulatory request;
- To enforce or apply our ([Terms and Conditions](#)) and other agreements;
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Public Trust, users of the Services, or others; and
- With your consent.

We also reserve the right to transfer your personal information to a buyer or other transferee in the event of a merger, divestiture, restructuring, reorganization, dissolution, sale, or other transfer of some or all of our assets, equity or similar transaction. Should such a sale, merger, or transfer occur, we will use reasonable efforts to direct the transferee to use your personal information in a manner that is consistent with our Privacy Policy.

5. DATA SECURITY

We have implemented measures, including adoption of policies based on the National Institute of Standards and Technology (NIST), intended to protect your personal information from accidental loss and from unauthorized access, use, alteration and disclosure. All information you provide to us is stored on secure servers behind firewalls. Access to your information is restricted to Public Trust employees, registered representatives, and designated software service providers used for legitimate business purposes. Any payment transactions will be encrypted using SSL technology. Please note that the electronic transmission of information is not completely secure. We cannot guarantee that the security measures we have in place to safeguard personal information will never be defeated or fail, or that such measures will always be sufficient or effective. Any transmission of personal information is at your own risk.

6. YOUR CHOICES

We offer you the following choices about the information we collect from you and how we communicate with you:

Cookies

Most browsers will tell you how to stop accepting new cookies, how to be notified when you receive a new cookie, and how to disable existing cookies. Please note, however, that without cookies you may not be able to take full advantage of all of the features of the Services.

Promotional Communications

If you have received a promotional email from us, you can opt out of receiving future promotional emails from us by following the unsubscribe instructions contained in such email.

Web Analytics

You may opt out of the aggregation and analysis of data collected about you on our website at [Google Analytics](#) and may opt out of collection of data by visiting [Lucky Orange](#).

Third-Party Tracking

Although we do not control third parties' collection or use of your information to serve interest-based advertising or other targeted content, a number of these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt out of receiving targeted advertisements from members of the Network Advertising Initiative by visiting [Network Advertising](#).

7. CHILDREN UNDER THE AGE OF 13

The Services are not directed to, and Public Trust does not knowingly collect or solicit personal information from, children under the age of 13. If we learn we have collected or received personal information from a child under the age of 13, we will delete that information. If you believe we might have any information from or about a child under the age of 13, please contact us.

8. CHANGES TO OUR PRIVACY POLICY

Public Trust reserves the right to update or change this Privacy Policy at any time. If we make a material change to our Privacy Policy, we will provide notice to you (by email) that our privacy practices have changed and will provide a link to the new policy. In the event we make a material change to how we use your personal information, we will provide you with an opportunity to opt out of such new or different use. The date this Privacy Policy was last revised is at the top of this page. We encourage you to review this Privacy Policy periodically to check for any updates or changes.

9. DATA TRANSFERS

Public Trust is based in the United States. When we obtain information about you, we may transfer, process, and store such information outside of the country in which you reside, including in the United States. By using the Services, you consent to the transfer to and processing and storage of your information in countries outside of your country of residence, which may have different data protection laws than those in the country where you reside.

10. OTHER CALIFORNIA PRIVACY RIGHTS

California's "Shine the Light" law (Civil Code Section § 1798.83) and California Consumer Privacy Act of 2018 (CCPA) provides additional rights to users of the Services that are California residents. For additional information, please visit our [California Privacy Notice](#).

11. CONTACT US

If you have any questions about this Privacy Policy or our information practices, please call us at (303) 295-0777, [Click Here](#), or write to us at Public Trust Advisors, LLC Compliance Department 717 17th Street, Suite 1850 Denver, CO 80202.

Privacy Notice for California Residents

Last Revised: **MARCH 1, 2022**

This Privacy Notice for California Residents supplements the information contained in the [Public Trust Advisors, LLC Privacy Policy](#) (“Public Trust” “we,” or “us”), which is incorporated in this privacy notice by this reference. This privacy notice applies to California residents from whom we collect personal information (“consumers” or “you”), including when you visit www.publictrustadvisors.com or use our other products and services that include an authorized link to this (“Services”) who reside in the State of California. We adopt this privacy notice to comply with the California Consumer Privacy Act of 2018 (“CCPA”) and any terms defined in the CCPA have the same meaning when used in this privacy notice.

1. Information We Collect

We collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household (“personal information”). Personal Information may include information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. Personal information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA’s scope.

In particular, within the last 12 months we have collected the following categories of personal information from the sources and for the business or commercial purposes described below:

Description of Category	What We Collect	Source	Business or Commercial Purposes for Collection
Identifiers (“ Identity Data ”).	A real name, postal address, online identifier, internet protocol address, email address, or other similar identifiers.	Directly from the consumer; indirectly from the consumer, e.g., through the use of cookies on the Services.	Providing our Services; sending communications; analyzing trends; enhancing our Services.
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)) (“ Customer Records Data ”).	A name, address, telephone number, employment, or any other financial information. *Some personal information included in this category may overlap with other categories.	Directly from the consumer.	Providing our Services; sending communications; analyzing trends; enhancing our Services.
Internet or other similar network activity (“ Internet Use Data ”).	Browsing history, search history, or information on a consumer’s interaction with a website, application, or advertisement.	Indirectly from the consumer, e.g., through the use of cookies on the Services.	Enhancing Services; analyzing trends.

2. Use of Personal Information

In addition to the business or commercial purposes for collection described above, we have in the preceding 12 months collected all categories of personal information described above for the following purposes:

- To process your requests and transactions and to prevent transactional fraud.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To create, maintain, customize, and secure your account with us.
- For testing, research, analysis, and product development, including to develop and improve the Services and our products.
- To provide, support, personalize, and develop the Services and our products.
- To help maintain the safety, security, and integrity of the Services and our products, databases, other technology assets, and business.
- To deliver content and product and service offerings relevant to your interests, including targeted offers and ads through the Services, third-party sites, and via email or text message (with your consent, where required by law).
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, equity or a similar transaction, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about the users of the Services is among the assets transferred.
- As otherwise described to you when collecting your personal information.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

3. Sharing Personal Information

We share your personal information for a business purpose to the following categories of third parties:

- Service providers.
- Cloud service providers.
- Operating systems and platforms.

When we disclose your personal information to a service provider, we enter into a contract with the service provider that describes the business purpose for which your personal information is disclosed and restricts the service provider from using your personal information for any purpose except performing the contract.

In the preceding 12 months, we have disclosed to these third parties the following categories of personal information for a business purpose:

- Identity Data.
- Customer Records Data.
- Commercial Data.
- Internet Use Data.

Sales of Personal Information

We do not sell your personal information, as defined by the CCPA, to third parties.

4. Your Rights and Choices

The CCPA provides you as California residents with specific rights regarding your personal information. This section describes your CCPA rights and explains how to exercise those rights.

Access to Specific Information and Data Portability Rights

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request (see Exercising Access, Data Portability, and Deletion Rights), we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we disclosed for a business purpose, a list identifying the personal information categories that each category of recipient obtained.

Deletion Rights

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request (see Exercising Access, Data Portability, and Deletion Rights), we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies. We may deny your deletion request if retaining the information is necessary for us or our service providers to:

- Complete the transaction for which we collected the personal information, fulfill the terms of a written warranty conducted in accordance with federal law, provide a service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise that consumer's free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of the information that are compatible with the context in which you provided it.

Exercising Access, Data Portability, and Deletion Rights

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by either:

- [Click Here](#) to download the form.
- Email us at compliance@publictrustadvisors.com.

Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child. You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. We may require authentication of the consumer that is reasonable in light of the nature of the personal information requested. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

For instructions on exercising sale opt-out rights, see Personal Information Sales Opt-Out and Opt-In Rights.

Response Timing and Format

We endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (for a maximum total of 90 days), we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option. If no preference is specified we will deliver our response electronically.

Any disclosures we provide will only cover the 12-month period preceding the receipt of a verifiable consumer request. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless the request is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request. Alternatively, we may decline to respond to the request and notify you of our reason for doing so.

5. Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits or imposing penalties.
- Provide you a different level or quality of goods or services, including denial of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

6. Other California Privacy Rights

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of the Services that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email to us.

7. Changes to this Privacy Notice

We reserve the right to update or change this privacy notice at any time. When we make changes to this privacy notice, we will post the updated notice on the Services and update the date on which this privacy notice was last updated. The date this privacy notice was last updated is at the top of this page. You are responsible for periodically reviewing the Services and this privacy notice to check for any updates or changes. Your continued use of the Services following the posting of changes constitutes your acceptance of such changes.

8. Contact Us

If you have any questions or comments about this privacy notice or our privacy practices, your choices and rights regarding use of your personal information, or wish to exercise your rights under California law, please call us at (303) 295-0777, email us at compliance@publictrustadvisors.com, or write to us at Public Trust Advisors, LLC Compliance Department 717 17th Street, Suite 1850 Denver, CO 80202.