

Our Privacy Policy

03-20-2024 There have been no changes to this policy from the previous year.

In simple terms:

We do not share or sell your information for our economic benefit.

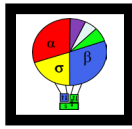
We do not discuss this information with anyone outside our firm without your prior consent.

We use your private information cautiously within our firm. It is used by us only to benefit you.

We store information at outside data processing and storage companies for your benefit (in order to perform financial analysis, data storage and data aggregation).

The 'government' may demand access to your information. They may also require us to bring in an outside auditing firm to verify that our clients are properly protected.

As a service to you, we may put your information on investment account applications etc. but this will be provided to you for your review and authorization before being forwarded on your behalf.



Information Provided by Clients

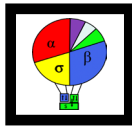
As a client of Advanced Portfolio Design, LLC, you share both personal and financial information with us. Your privacy is important to us, and we are dedicated to safeguarding your personal and financial information. In the normal course of doing business, we typically obtain the following non-public personal information about our clients:

- Personal information regarding our clients' identity such as name, address, and social security number;
- Information regarding securities transactions effected by us;
- Client financial information such as net-worth, assets, income, bank account information and account balances, and
- Personal history, goals, concerns and preferences.

How we use your information

In order to provide the best advice possible, your personal information is used by us to benefit you by:

1. Analyzing your financial circumstances and goals.
2. Evaluating your investments.
3. Attempting to understand your individual perspectives.



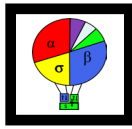
How we may share your information

We will not share nonpublic personal information about clients or consumers with third parties not affiliated with Advanced Portfolio Design, LLC, except as noted below. Specifically, Advanced Portfolio Design, LLC may share personal information as necessary:

1. To assist a client in opening various accounts, we may fill out electronic account applications for you with your verbal approval;
2. To complete transactions or account changes as directed by the client;
3. To maintain or service a client's account;
4. If requested to do so by a client;
5. With contracted service providers providing administrative functions for Advanced Portfolio Design, LLC; [current service providers are; Advyzon and eMoney]
6. If Advanced Portfolio Design, LLC is required by law or regulatory authorities with jurisdiction over the firm to do so.

How we do not use personal information

1. We do not share client data with any outside entities or any affiliates for economic benefit.
2. We do not include individual names on a "representative client list" provided to outside entities or individuals.
3. We do not have joint marketing arrangements with outside marketing entities which have access to information about our clients.
4. We do not discuss or share your information with any outside people without your consent.
5. We do not allow employees to have access to your information unless they have a specific duty with a specific need for your information.



Our Data Security Policy

Paper Storage

Paper documents containing personally identifiable client data is kept in locked cabinets at our office. Initial analysis work, meeting notes and ongoing project work will typically have a paper component in the client file. Within a reasonable time of completing a project, the paper will be scanned into our database and then shredded.

Digital storage

We believe that highly encrypted, physical firewall protected, computer storage is the most secure way to hold your information. Data that is not encrypted is physically locked up. We strive to keep paper documents to a minimum because they are really only protected by locked doors and drawers.

All of our client data is backed up to an encrypted file and locked in a secure remote location.

Our computers are locked down when they are unattended.

Our goal is to have a situation where if our computers were stolen or destroyed, we would suffer no loss of data and a data thief would have gained nothing.

We also take many other data security measures which would be unwise to publish.