



# Custom Portfolio Group LLC Privacy Policy

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The U.S. Securities and Exchange Commission (“SEC”) issued Regulation S-P on June 22, 2000 to protect the privacy of financial information. Under Regulation S-P, financial institutions must provide their customers with notice of their privacy policies and practices.

This Custom Portfolio Group LLC Privacy Policy is current as of January 1, 2022.

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Custom Portfolio Group LLC (“CPG”) is committed to safeguarding the personal information it obtains from clients and prospective clients. This policy describes how CPG protects personal information collected about individuals and entities that retain its investment services. The provisions of this policy apply to former, current, and prospective clients.

**Personal Information Collected.** CPG collects personal information about its clients to evaluate their financial needs, manage their accounts, and provide individualized investment and planning advice. The personal information obtained includes information: (1) provided on applications and other forms (such as name, contact information, social security number, occupation, assets, and income); (2) communicated to CPG about clients’ financial circumstances; (3) obtained from clients or outside parties about client transactions (such as custodial statements and trade confirmations); (4) provided in the course of assisting clients with financial planning; and (5) obtained from clients in connection with providing financial services (such as correspondence and notes from telephone conversations or meetings).

**Use and Disclosure of Personal Information.** In the normal course of business, personal information we collect about clients, may be shared with individuals or entities who provide services on behalf of our clients’ accounts, including brokerage firms, custodians, or software providers. We may disclose all of the information we collect about clients to non-affiliated, third-party service providers as necessary in the following situations: (1) to administer a transaction that a client requests or authorizes; (2) to assist us in maintaining or servicing a client’s account; (3) to enable a third party to perform general administrative activities for us or to assist us in processing a transaction authorized or requested by a client; (4) as required by a regulatory authority or law enforcement agency; (5) to assist us in resolving customer disputes or inquiries; (6) to persons holding a legally-recognized interest relating to the customer; (7) to our attorneys, accountants, or auditors as deemed necessary; (8) in connection with a proposed or actual sale or merger of our firm; (9) to comply with a civil, criminal, or regulatory investigation by federal, state, or local authorities; and (10) as otherwise authorized by a client, either verbally or in writing.

**Protecting Personal Information.** Access to clients’ personal information is limited to those employees who need to know such information to service clients’ accounts and help them accomplish their financial objectives. Employees are required to use their best efforts to maintain and protect the confidentiality of all personal information. To comply with applicable laws and regulations, CPG maintains physical, electronic, and procedural safeguards to protect this information. CPG also employs technology consultants who help maintain the firm’s network and software systems.

**Information Sharing with Affiliates.** CPG currently does not have any affiliates (defined as companies controlled or under common control or ownership). In the event that we have affiliates in the future, we may share the personal information described above as permitted by applicable law.

**Disclosure for Marketing Purposes.** CPG will not share the personal information described above for the purpose of allowing us or any other entity to market products or services to you or otherwise solicit business from you.

**Accessing and Revising Personal Information.** CPG strives to keep its client files complete and accurate. Upon request, a client may gain access to any information it maintains. Clients are encouraged to review their portfolio reports and correspondence and notify CPG if they believe any information should be corrected or updated. Clients are also urged to contact CPG if they have any questions or concerns regarding this privacy policy.