



Privacy Policy

Protecting your privacy and safeguarding your personal and financial information is one of our highest priorities. The following policy provides you with an explanation as to how we collect and protect your information.

Personal Information Collected

We collect information as required by law to allow us to transact business with you as well as voluntarily to improve our services and products you may be interested in.

We may also use demographic information provided to us by others to further enhance our services provided to you and your browsing experience when visiting our site.

Sharing of Nonpublic Information

Smart Portfolios™ does not disclose nonpublic personal information relating to current or former customers to any third parties, except as required or permitted by law and in order to facilitate the clearing of customer transactions in the ordinary course of business. We do not sell, license, lease or otherwise disclose your personal information to any third party for any reason, except as previously noted or as described below:

- To invite you to view advertisements or participate in promotions and special offers by our firm or other sponsors.

- To help us identify and analyze your needs and notify you of new product offerings.
- To provide your name as a reference to a prospective client.

When we use your information for any purpose above we limit the use to the performance of the task mentioned. All third parties with whom we share personal information must protect that information similar to the way we protect it. If you elect to purchase a product or service or open an account with a third party including retailers, airlines, ISPs, etc. then any personal information you share with that company will no longer be controlled by our Privacy Policy. We reserve the right to disclose your personal information when required by law to regulatory, law enforcement, or other government authorities. It may also be used as necessary for credit reporting or collection agencies, or when necessary to protect our rights and property.

Security Issues of Linked Sites

Information you provide on other sites, including those to which you link from our site, is going to a third party and you should be aware of that party's privacy policies. We use the utmost care and diligence in determining to which sites we link but ultimately we are not responsible for the policies or the content of those sites and have no control of the use or protection of that data.

Security

Smart Portfolios™ strives to ensure that our systems are secure and that they meet industry standards. We protect personal information that is provided to Smart Portfolios™ by you by maintaining physical, electronic and procedural safeguards that either meet or exceed applicable law. Where appropriate, we employ firewalls, encryption technology, user authentication system (i.e.

passwords and personal identification numbers) and access control mechanisms to control access to systems and data. Third parties who may have access to such personal information must also agree to follow appropriate standards of security and confidentiality. We instruct our employees to use strict standards of care in handling the personal financial information of customers. As a general policy our staff will not discuss or disclose information regarding an account except with authorized personnel of our clearing broker or as required by law or pursuant to regulatory request and/or authority.

Opting Out of Sharing Your Personal Information

You may direct us to not disclose your non-public personal information to certain non-affiliated third parties. If you want to opt out of this sharing you can send an email to service@smartportfolios.com with the words "opt-out" in the subject line and your account number and name in the body text. (Vermont residents only: Your non-public personal information will only be shared if you opt-in. You can do this by sending an email to service@smartportfolios.com with the words "VT opt-in" in the subject line and your account number and name in the body of the text. You cannot opt-out of disclosure of non-public personal information if we need to disclose the information to effect, service, or process a securities transaction or other service you have authorized or requested or to protect against fraud, liability, or other damages. You also cannot opt-out if we need to disclose the information to respond to judicial process.

Changes to Smart Portfolios™ Privacy Policy

Smart Portfolios™, LLC reserves the right to make changes to this policy. In the event of a change or revision to this policy we will promptly post the changes

to our web site. You agree to accept the posting of a revised policy electronically on the web site as actual notice to you. You should review the policy periodically to remain currently informed.

How to Get in Touch with Smart Portfolios™ about this Privacy Policy

For more information relating to Smart Portfolios™ privacy policy, please contact:

Smart Portfolios™, LLC
17865 Ballinger Way NE
Seattle, Washington 98155
Attn: Compliance Department