

SMART PORTFOLIOS, LLC PRIVACY NOTICE

Pursuant to applicable federal and/or state privacy regulations Smart Portfolios, LLC (referred to as “Smart Portfolios”) is a financial institution that has determined to keep confidential nonpublic personal information about each Smart Portfolios client.

Nonpublic Personal Information is defined to mean personally identifiable financial information that is provided by a consumer to a financial institution, results from any transaction with the consumer or any service performed for the consumer or is otherwise obtained by the financial institution.

Personally Identifiable Financial Information means any information: (1) a consumer provides to a financial institution to obtain a financial product or service; (2) about a consumer resulting from any transaction involving a financial product or service between a financial institution and a consumer; or (3) a financial institution otherwise obtains about a consumer in connection with providing a financial product or service to that consumer.

Attached hereto and made a part hereof is a copy of Smart Portfolios’ *Privacy Notice* that is to be distributed by Smart Portfolios: (1) initially: (a) to each existing Smart Portfolios client; and (b) to each new client prior to or at the time of establishing a “customer relationship” with Smart Portfolios; and (2) annually thereafter for as long as the client maintains its relationship with Smart Portfolios (however, per the SEC, unless there are material changes, Smart Portfolios is no longer required to provide the *Privacy Notice* annually. Smart Portfolios may determine to cease providing the *Privacy Notice* on an annual basis).

The purpose of Smart Portfolios’ *Privacy Notice*, *Privacy Policy* as well as its underlying procedures is to protect the confidentiality and security of its clients’ *nonpublic personal information*. The categories of nonpublic personal information that Smart Portfolios collects from a client depend upon the scope of the client engagement. It may include information about the client’s personal finances, information about the client’s health to the extent that it is needed for the planning process, information about transactions between the client and third parties, and information from consumer reporting agencies. Smart Portfolios has instituted certain technical, administrative, and physical safeguards through which Smart Portfolios seeks to protect this *nonpublic personal information* about current and former clients from unauthorized use and access. First, technical procedures are used in order to limit the accessibility and exposure of client information contained in electronic form. Second, administrative procedures are used in order to control the number and type of employees, affiliated and nonaffiliated persons, to whom customer information is accessible. Third, physical safeguards have been established to prevent access to client information contained in hard-copy form. As illustrated above, Smart Portfolios realizes the importance of information confidentiality and security and emphasizes practices which are aimed at achieving those goals.

Should you have any questions regarding the above, contact Smart Portfolios’ Chief Compliance Officer, Kristin Copper.