

Advisory Solutions Group - Palouse Portfolios

Privacy of Client Information

At Advisory Solutions Group ("ASG"), also doing business as FocusPoint Solutions ("FPS") maintaining the trust and confidence of our clients is a high priority. That is why we want you to understand how we protect your privacy as we collect and use your information to provide products and services that support your investment needs. We are strongly committed to fulfilling the trust that is the very foundation of your expectations. Therefore, we have adopted and adhere to the following policy regarding the privacy of our clients' non-public personal information.

1. NON-PUBLIC PERSONAL INFORMATION THAT WE COLLECT

We collect non-public personal information about our clients from various sources which include:

- Information we receive from the completion of our new account form, fact-finding questionnaires, and product applications;
- Investment transactions with us, our affiliates, and those product sponsors with whom we have selling agreements or other arrangements for the provision of services to clients;
- Consumer reporting agencies; and
- Affiliated and non-affiliated product sponsors whose products are owned by our clients.

2. USE OF NON-PUBLIC PERSONAL INFORMATION

We disclose, to the extent collected as defined above, non-public personal information to affiliated and non-affiliated companies that provide contracted services in order to service our clients more effectively and efficiently. We ensure contractual restrictions on the affiliated and non-affiliated companies' use and disclosure of the non-public personal information we disclose. Affiliated companies are defined as companies related by common ownership or control. Non-affiliated companies are defined as companies not related by common ownership or control.

Affiliated and non-affiliated companies with whom we disclose non-public personal information include, but are not limited to:

- ASG and FPS affiliated companies;
- Mutual fund companies, insurance companies and other product sponsors to effect purchases and sales and allow for the servicing of client accounts;
- The broker-dealer through whom we execute securities transactions;
- Clearing agencies through whom we clear and settle securities transactions;
- Third-party investment advisory firms with whom we have relationships for the management of client advisory accounts;
- Broker-dealer firms having regulatory requirements to supervise certain activities of representatives who are also registered with a broker-dealer;
- Banks and other financial institutions with whom we have arrangements for the marketing and sale of our products and services; and
- Companies that provide services to us that assist with the maintenance of required books and records or to facilitate mailings on our behalf.

We do not disclose your information to non-affiliated companies who intend to market their products to you.

3. PROTECTION OF NON-PUBLIC PERSONAL INFORMATION

We have established information security practices and procedures to prevent unauthorized use or access to nonpublic personal information. Access to non-public personal information is made available to our employees who process or service transactions and fulfil compliance, legal or audit functions. Our computer systems utilize password protection to prevent access by unauthorized personnel, and we employ other physical, electronic, and procedural safeguards to ensure the protection of non-public personal information in accordance with state and federal privacy regulations.

4. "OPT-OUT" OF NON-AFFILIATED THIRD-PARTY DISCLOSURES

ASG does not share your nonpublic personal information with non-affiliated third parties for their own marketing purposes. We may disclose information to non-affiliated third parties as permitted by law to service your account or conduct our business.

If you prefer to limit our sharing of your nonpublic personal information with non-affiliated third parties beyond what is permitted by law, you may submit a written request to the address listed below.

In certain states, including California, North Dakota, and Vermont, we will obtain your affirmative consent before sharing your nonpublic personal information with non-affiliated third parties when required by applicable law.

If your financial professional leaves ASG, we may share limited information as permitted by law to facilitate the continued servicing of your account, unless you instruct us otherwise.

Nevada Residents: We are providing you this notice pursuant to state law. You may be placed on our internal "Do Not Call List" by contacting by contacting us at the phone number or address below, or by contacting the Bureau of Consumer Protection, Office of the Nevada Attorney General, 555 E. Washington St., Suite 3900, Las Vegas, NV 89101; 702-486-3132; AgInfo@ag.nv.gov.

5. CONTACT US

If you have any questions about our Privacy Policy, or if you have any questions concerning your account, please contact us at 800-492-1222. If you prefer, you may write to us at Advisory Solutions Group, LLC, Attn: Compliance, 505 North Highway 169, Suite 900, Plymouth, MN 55441. We appreciate your business and look forward to serving your financial service needs.