

FACTS**WHAT DOES MILLER AVENUE ADVISORS DO WITH YOUR PERSONAL INFORMATION?**

Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
What?	The types of personal information we collect, and share depend on the product or service you have with us. This information can include: <ul style="list-style-type: none"> • Social Security number and income • Account balances and payment history
How?	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons we choose to share; and whether you can limit this sharing.

Reasons we can share your personal information	Do we share?	Can you limit this sharing?
For our everyday business purposes— such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes— to offer our products and services to you	No	NA
For joint marketing with other financial companies	No	NA
For our affiliates' everyday business purposes— information about your transactions and experiences	NA	NA
For our affiliates' everyday business purposes— information about your creditworthiness	NA	NA
For our affiliates to market to you	NA	NA
For non-affiliates to market to you	NA	NA

Who we are**Who is providing this notice?**

Miller Avenue Advisors, LLC

What we do**How do we protect your personal information?**

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.

How do we collect your personal information?We collect your personal information, for example, when you

- Open an account or deposit money

Why can't you limit all sharing?	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> • Sharing for affiliates' everyday business purposes—information about your creditworthiness • Affiliates from using your information to market to you • Sharing for non-affiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing.</p>
What happens when you limit sharing for an account you hold jointly?	Your choices will apply to everyone on your account—unless you tell us otherwise.
Definitions	
Affiliates	Companies related by common ownership or control. They can be financial and non-financial companies
Non-affiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies.
Joint marketing	A formal agreement between non-affiliated financial companies that together market financial products or services to you.

Your Rights and Choices: The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how you can exercise them.

Access to Specific Information and Data Portability Requests: You may request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request (see Exercising Access, Data Portability, and Deletion Requests below), we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we disclosed your personal information for a business purpose, two separate lists disclosing: (i) sales, identifying the personal information categories that each category of recipient purchased; and (ii) disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

Deletion Requests: You may request that we delete any of your personal information we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request (see Exercising Access, Data Portability, and Deletion Requests), we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request, in whole or in part in accordance with any purpose that is permitted by the CCPA. For example, we may deny your deletion request if retaining the information (or a portion thereof) is necessary for us or our service provider(s) to:

- Complete the transaction for which we collected the personal information, provide a product or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you;
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities;
- Debug products to identify and repair errors that impair existing intended functionality;
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law;
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.);
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us;

- Comply with a legal obligation; and/or
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Exercising Access, Data Portability, and Deletion Requests: To exercise an access, data portability, or deletion request as described above, please submit a verifiable consumer request to us in one of the following ways:

- Send an email to alex@milleraveadvisors.com to inquire as to which elements of your information it's possible for us to delete.
- If you would like to close your account, please contact your investment adviser representative.

Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative; and
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. Making a verifiable consumer request does not require you to create an account with us. However, we do consider requests made through your password protected account sufficiently verified when the request relates to personal information associated with that specific account.

We will only use personal information provided in a verifiable consumer request to confirm the requestor's identity or authority to make the request.

Response Timing and Format: We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time, we will inform you of the reason and extension period in writing. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Opting Out from the Sale of Personal Information: We do not sell your personal information. We will only use and share your personal information according to this Privacy Policy and as outlined in our Investment Advisor Agreement with you. If we later decide to sell our clients' personal information, you will be notified immediately and you will be provided with the proper disclosures and the opportunity to exercise your right to "opt-out".

Non-Discrimination: We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties other than for reasons described in our Form ADV Part 2A or Investment Advisory Agreement.
- Provide you a different level or quality of products or services except as otherwise described in our Form ADV Part 2A or Investment Advisory Agreement.
- Suggest that you may receive a different price or rate for products or services or a different level or quality of products or services except as otherwise described in our Form ADV Part 2A or Investment Advisory Agreement.