



**ORG PORTFOLIO MANAGEMENT LLC**  
**Privacy Policy - 2024**

ORG Portfolio Management LLC (“us” or “we”), a Registered Investment Adviser under the Investment Advisers Act of 1940, as amended, is committed to safeguarding the confidential information of its clients. We hold all personal information provided to our firm in the strictest confidence. These records include all personal information that we collect from you in connection with any of the services we provide. We may share nonpublic personal information about our clients or potential clients with our affiliates as permitted by law. We do not disclose nonpublic personal information about our clients or potential clients to nonaffiliated third parties, except as permitted by law (for example, to service providers who provide services to the client or the client’s account). This privacy policy applies to former clients as well.

We use financial information that you provide to us to help you meet your financial goals while guarding against any real or perceived infringements of your rights of privacy.

Our policy with respect to personal information about you is listed below:

- We limit employee and agent access to information only to those who have a business or professional reason for knowing and only to nonaffiliated parties as permitted by law.
- We maintain a secure office and computer environment to ensure that your information is not placed at unreasonable risk.
- The categories of nonpublic personal information that we collect from a client depend upon the scope of the client engagement. It could include information about your personal finances or financial information from your firm, information about transactions between you or your firm and third parties and information from consumer reporting agencies.
- For unaffiliated third parties that require access to your personal information, including financial service companies, consultants and auditors, we also require strict confidentiality in our agreements with them and expect them to keep this information private. Federal and state regulators also may review firm records as permitted under law. We may also share your personal information in order to respond to a subpoena or court order or other judicial process.
- We do not provide your personally identifiable information to mailing list vendors or solicitors for any purpose. We may share your personally identifiable information in connection with a proposed or actual sale, merger or transfer of all or a portion of our business.
- Personally identifiable information about you will be maintained during the time you are a client and for the required time thereafter that such records are required to be maintained by federal and state securities laws. After this required period of record retention, all such information will be destroyed.

We reserve the right to change this privacy policy at any time. The examples contained within this policy are illustrations and are not intended to be exclusive. While this policy complies with federal law regarding privacy, you may have additional rights under other foreign or domestic laws that may apply to you.