

In the course of providing its services, Portfolio Solutions, LLC may gather nonpublic personal information about its customers from the following sources:

- *Account application and other forms*, which may include a customer's name, address, social security number and information about a customer's investment goals and risk tolerance;
- *Account history*, for example, copies of trade confirmations or statements which may include information about investment transactions or the balance in a customer's account;
- *Third parties*, such as a consumer reporting agency; and
- *Correspondence*, written or electronic or telephonic communication between Portfolio Solutions, LLC and a customer.

Portfolio Solutions, LLC may disclose any of the information it collects about customers (or has collected about former customers) to third parties who are not affiliated with Portfolio Solutions, LLC under the following circumstances:

- As directed or authorized by the customer;
- As permitted by law, for example, to service providers who provide investment products or services to the customer, in order to effect or settle trades on the client's behalf, in connection with a regulatory audit or examination, or to respond to a subpoena or similar legal process;
- To parties providing services to Portfolio Solutions, LLC, such as database service companies or data conversion companies. Such companies shall be contractually prohibited from disclosing or using client information other than to perform the services contracted for.

Portfolio Solutions, LLC has adopted procedures to protect the integrity and confidentiality of client information. Among other things, Portfolio Solutions, LLC restricts access to personal and account information to those persons who need to know the information in order for Portfolio Solutions, LLC to provide its services. Moreover, Portfolio Solutions, LLC Code of Ethics, which applies to all of its employees, requires that customer information be held in strict confidence.

Any questions concerning this Privacy Policy should be directed to Portfolio Solutions, LLC Chief Compliance Officer.