Privacy Policy

As required by the Securities and Exchange Commission and the Federal Trade Commission, this memo explains how Portfolio Management, LLC (the Advisor) handles the personal and private information of its clients. It reiterates a firm commitment to maintaining the personal information of clients in the strictest confidence and keeping this information private at all times.

It is the strong belief of Advisor that client relationships are the most important asset to the business. To maintain a trust and bond with clients, the Advisor does not disclose any confidential personal information about clients to anyone, except as required by law or as specified by a client- such as providing financial information to an accountant, attorney or family member specifically designated by the client.

Examples of when personal information might be shared as required by law include the mandatory cooperation with law enforcement authorities in a bona fide investigative matter or with securities regulators, such as the Securities and Exchange Commission, in a legitimate regulatory inquiry.

In the ongoing practice of managing a client's monies, no additional personal information is shared with account custodians such as Schwab that the client has not already agreed to provide to the custodian for the purposes of opening and maintaining an account.

Other than the above, at no time does the Advisor share the personal information of any client to anyone, for any reason, at any time without the permission of the client. Any doubts about the confidentiality of client information will be resolved in favor of confidentiality.