ROI FINANCIAL

2022 Annual Privacy Notice

At ROI Financial Advisors, LLC ("ROI"), your privacy is our priority. We collect personal information to open your accounts, to manage your portfolios and to help us provide a better level of service. We protect the security and confidentiality of the personal information that we collect.
Our relationship with you is our most important asset. We understand that you have entrusted us with your private information and we do everything we can to maintain that trust. The following are details of our approach to privacy.

1. We do not sell your personal information to anyone.

2. ROI only shares personal information with third parties and affiliate companies that help us process transactions or service your account (for example executing your trades, acting as your custodian, or mailing your account statements).

We may also disclose or report personal information in limited circumstances where we believe in good faith that disclosure is required by law (for example, to cooperate with regulators or law enforcement authorities, resolve client disputes, perform credit/authentication checks, or for risk control). Outside of these exceptions, we will not share your personal information with third parties unless you have specifically asked us to do so.

3. We collect personal information in the normal course of business in order to administer your accounts and serve you better.

Application and Registration Information
We collect information that you provide to us when you open an account, make application to or through ROI for the purchase of a securities product or service. The information we collect may include name, address, phone number, e-mail address, Social Security number, financial information and information about your investment desires and experience. We also may collect information from consumer reporting agencies to verify your identity in the account opening process.

Transaction Information
Once you have an account with us, to administer your account and better serve you, we collect and maintain personal information about your transactions, including balances, positions and history, and may include your name or other data in an internal client list that reflects your activities at ROI and with outside contracted providers.

4. We use your personal information to fulfill our regulatory obligations and to help us deliver the best possible service to you.

ROI is required by its various regulatory authorities such as the US SEC and state jurisdictions to collect, review and maintain certain personal information such as investment history or financial data.

Also, the USA PATRIOT Act requires that ROI collect and verify certain personal information to assist it in verifying the identity of its clients and the sources of funds in an effort to prevent money laundering and terrorism.

5. We protect the confidentiality and security of your personal information.

Companies we hire to provide support services are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of your personal information to the performance of the specific service we have requested. We restrict access to personal information to select employees and agents who have a need to know such information for business purposes only. All such employees are trained and required to safeguard such information. We also maintain physical, electronic and procedural safeguards to guard your personal information.

6. We continue to evaluate our efforts to protect personal information and make every effort to keep your personal information accurate and up to date.

If you identify any inaccuracy in your personal information, or you wish to make a change to that information, please contact us so that we may promptly update our records.

7. We will provide notice of changes in our information-sharing practices.

If, at any time in the future, it is necessary to disclose any of your personal information in a manner that is inconsistent with this policy, we will give you advance notice of the proposed change so that you have an opportunity to opt out of such disclosure.

If you have any questions or concerns, please contact us by e-mail at lance.j.johnson@roi-fa.com or call us at 1-503-941-5925.

Protection of Customer Information and Records

- ROI has adopted procedures to protect customer information, including the following:
- Customers will be provided the Firm's Privacy Policy at the time an account is opened.
- Computerized customer information is accessed by password protection or other established controls within the ROI system to ensure only authorized persons gain access.
- Requests for customer information from outside parties such as regulators, the IRS, and other government or civil agencies, shall be referred to the CCO for review and response.
- Customer non-public information shall not be provided to non-affiliated third parties and will be provided to affiliated parties (executing dealers, technical service providers who maintain the security of your records etc.) only by written agreement.
- Customers may provide written permission to ROI to share information with other non-affiliated third parties such as attorneys; accountants and other consultants for the purpose of helping ROI better understand the client's financial situation in order to provide more effective investment and financial planning advice to the client.
- All agreements with executing firms, custodians, and other service providers shall include the third party's privacy policies or confidentiality clause as appropriate.
- The integrity of ROI's internal computer systems, including privacy protection, is subject to regular review.
- As required by law, federal authorities and states will be notified if customer information is stolen making it subject to potential identity theft.
- ROI shall assess the impact on customer confidentiality of any new technologies that may be introduced to ROI or that ROI may obtain in the future.
- ROI shall implement the Federal Trade Commission's Red Flags Rule, which implements Section 114 of the Fair and Accurate Credit Transactions Act of 2003 ("FACT Act").

Access to Customer information via Wi-Fi

Because of risk of unauthorized access by outside parties and the difficulty of ensuring the security of wireless connections to the Internet, employees are not permitted to use wireless fidelity (Wi-Fi) to access customer account information, unless:

- The employee is working on the ROI premises; or
- The employee has installed Firm-required fire walls or other protections and has prior approval from the CCO to use Wi-Fi for Firm business.

Remote Access to Customer Accounts

Certain employees may be authorized to work from home or while traveling during which time the Firm's network may be accessed.

- Proper authorization must be requested from the CCO who will ensure that proper passwords are assigned and that a record of authorized employees is maintained. Fire walls and other protections are in place to prevent intrusion by outsiders and breaches of confidentiality.

Disposal of Consumer Report Information and Records

Consumer report information and records will be disposed of in a manner to prevent unauthorized access or use. Procedures include the following:

- Staff Members shall be trained with respect to proper disposal procedures.
- For the purpose of this Section, "consumer report information" shall include any document that contains the name of a client or information pertaining to a client or ROI.
- Paper information identified to be discarded or destroyed shall be shredded. Documents identified for shredding shall be placed in locked shredding bins located in secure areas. Clients are not to be permitted in these areas.
- Staff members are prohibited from maintaining electronic client information on a personally owned computer.
- Electronic information located on ROI computers shall be destroyed or erased so the information cannot be practicably read or reconstructed.