POWERHOUSE

Financial Advisors

PRIVACY NOTICE

Powerhouse Financial Advisors, Inc. • SEC-Registered Investment Adviser • Rev. August 2026

Our commitment to your privacy

Powerhouse Financial Advisors, Inc. ("PHFA," "we," "us") is committed to safeguarding the nonpublic personal information ("NPI") you entrust to us. This notice describes the information we collect, how we use and share it, how we protect it, and what we will do if we become aware that your sensitive customer information has been accessed or used without authorization. It applies to current and former clients.

We provide this notice when you become a client and whenever our practices change in a way that requires it.

Information we collect

In the course of providing investment advisory and financial planning services, we collect NPI from the following sources:

- Information you provide on applications, agreements, planning questionnaires, and in conversations — such as your name, address, Social Security number, date of birth, income, assets, investment objectives, and risk tolerance
- Information about your transactions and accounts with us, your custodians, and retirement plan recordkeepers
- Information received from third parties you authorize, such as your accountant, attorney, insurance carriers, or prior adviser
- Information generated through your interactions with us — including communications you send to us, notes from meetings, and recordings or transcripts of calls and meetings where we have disclosed that recording is taking place and you have consented

How we share information — and how we do not

We do not sell your information. We do not share your NPI with nonaffiliated third parties for their own marketing purposes. We share NPI only as follows:

- **To service your accounts and deliver our services:** with the service providers who support our operations — including custodians and retirement plan recordkeepers, portfolio management and performance reporting, financial planning software, client relationship management, secure document storage and electronic signature, communications archiving, and telephone and videoconference systems — each of which receives only the information needed to perform services for us.
- **At your direction or with your consent:** if you ask us to work with, or accept a referral to, another provider — for example, a referral of retirement plan account management to Howard Capital Management, tax preparation services through Steven James Financial, or insurance products through our principal's licensed insurance activity — we share only the information needed to effect the engagement you have requested. These relationships and the compensation we may receive are disclosed in our Form ADV Part 2A and Form CRS.

- **As permitted or required by law:** to regulators (including the SEC), in response to subpoenas or legal process, to protect against fraud, or as otherwise permitted by Regulation S-P.

Because we share NPI only under these exceptions, no opt-out right is required under federal law — there is no sharing to opt out of. If our practices ever change in a way that would give you an opt-out right, we will notify you and provide it before sharing.

Our service providers

Where a service provider receives NPI in connection with services performed for us, we require by written agreement that the provider maintain reasonable safeguards to protect that information, use it only for the purposes for which it was provided, and notify us promptly of any incident involving unauthorized access to or use of that information.

We maintain a current inventory of the service providers that receive NPI and review their security practices in a manner commensurate with the sensitivity of the information they handle. Certain providers use automated or AI-assisted features — for example, to transcribe or summarize communications and meetings. Those tools are subject to the firm's written AI Governance Program, which restricts what information may be processed and requires contractual limits on the provider's use of that information, including restrictions on using it to train models.

How we protect your information

We maintain administrative, technical, and physical safeguards reasonably designed to protect NPI from unauthorized access, use, alteration, or disposal. Depending on the systems involved and the sensitivity of the information, these safeguards include:

- Access limited to personnel with a legitimate business need
- Multi-factor authentication on systems holding client data
- Encryption of data in transit and on firm devices
- Verification procedures before acting on any money-movement or account-change request, including direct voice confirmation of requests received by email
- Oversight of service providers with access to client data
- Ongoing training and periodic testing of safeguards, with remediation of any deficiency identified
- Secure disposal of records
- A written incident response plan

Notification of unauthorized access

If we become aware that sensitive customer information — information such as your Social Security number, account number, or access credentials, alone or in combination with other data — has been, or is reasonably likely to have been, accessed or used without authorization, we will notify you as soon as practicable, and in any event no later than thirty (30) days after we become aware.

We will provide that notice unless we determine, after a reasonable investigation, that the information has not been and is not reasonably likely to be used in a manner that would result in substantial harm or inconvenience to you. If the U.S. Attorney General determines in writing that notification poses a substantial risk to national security or public safety, we may delay notice for the period permitted under SEC rules.

The notice will describe the incident in general terms, the type of information involved, the steps we have taken in response, steps you can take to protect yourself, and how to contact us with questions.

Retention and disposal

We retain records for the periods required by law — generally five years, and six years for certain retirement account records — and may retain them longer where a legal hold, regulatory inquiry, or other legal obligation applies. When information is no longer required to be retained, we dispose of it in a manner reasonably designed to prevent unauthorized access.

Former clients

If your relationship with us ends, we continue to protect your NPI under this notice for as long as we retain it.

Changes to this notice

We may update this notice from time to time. We will provide a revised notice where our practices change in a way that requires it. The current version is available on our website and is delivered with new client paperwork.

Questions

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