

Harvest Capital Privacy Policy

Harvest Capital takes Clients' privacy very seriously. Harvest Capital shares a commitment to protect Clients' privacy and the confidentiality of personal and financial information.

As providers of products and services that involve compiling personal—and sometimes, sensitive—information, protecting the confidentiality of that information has been, and will continue to be, a top priority throughout Harvest Capital. Harvest Capital believes that Clients should know about the information collected, the measures taken to safeguard it, and the situations in which Harvest Capital might share information with select business partners. This notice explains how Harvest Capital handles—and protects—the personal information collected.

The information Harvest Capital collects and the extent to which it will be used varies depending on the products or services involved.

Harvest Capital's privacy promise derives from basic principles of trust, ethics, and integrity.

Harvest Capital collects information to help serve Clients' financial needs; provide high standards of customer service; develop and offer new products or services for customers and potential customers; and fulfill legal and regulatory requirements. The information collected generally varies depending on the products or services requested and may include:

Information provided in personal interviews or on applications and related forms—for example: name, address, Social Security number and annual income.

Responses from employers, benefit plan sponsors, or associations regarding any group products Harvest Capital may provide, for example: name, age, address and Social Security number.

Third-party reports, such as consumer credit history, motor vehicle records, demographic, and/or medical information, if relevant to Clients' service.

Information about Clients' relationships with Harvest Capital, such as products or services purchased, and account balances (if applicable), which Harvest Capital may obtain in writing, during telephone or Internet transactions or from data gathering software.

Harvest Capital has implemented security standards and processes—including physical, electronic and procedural safeguards—to ensure that access to customer information is limited to employees, registered representatives and agents who may need it to do their jobs. They are required to respect the confidentiality of all customer information.

First and foremost, Harvest Capital does not sell lists of customers, nor does Harvest Capital disclose customer information to marketing companies outside Harvest Capital, with the exception of companies Harvest Capital may hire to provide specific services, as described below.

Under no circumstances does Harvest Capital share medical information for marketing purposes.

Harvest Capital will share customer information only for the following reasons:

When it is necessary to disclose information to third parties to effect, administer, or enforce a transaction that Clients request or authorize—for example, when Harvest Capital provides information Harvest Capital collects to a mutual fund company from which Clients wish to purchase shares.

When Clients have requested a life insurance product, Harvest Capital may use a common application to avoid multiple medical tests; in this way, the information Clients provide and authorize Harvest Capital to obtain may subsequently be used by one or all of these companies as necessary to determine—and offer to Clients—the product most appropriate for Clients' needs.

When Harvest Capital is required by law or regulation to disclose information to third parties—for example, in response to a subpoena; to prevent fraud; and to comply with rules of, or inquiries from, industry regulators.

In some cases, Harvest Capital may share information Harvest Capital collects—for example, name, address, age and Social Security number, with other Harvest Capital personnel to process or service transactions Clients have requested; to facilitate enhanced customer services; or to inform Clients of financial products or services Clients may find useful. The registered representative or agent with whom Clients work to obtain financial products and services may use the personal information about Clients in his or her files to advise Clients of other products or to help Clients with their overall financial strategy.

Harvest Capital registered representatives leaving the firm, may be allowed, in certain instances, to take with them client files which may include but is not limited to the following client information: name, address, telephone number, Social Security number, account numbers, confirmations and statements of transactions. If a client does not want to give permission to share this information with the departing representative a client may notify compliance at Harvest Capital, immediately upon opening an account or a client may choose not to open an account with the Harvest Capital representative.

Furthermore, as permitted by federal and state laws, Harvest Capital may share or exchange information with companies engaged to work with Harvest Capital, such as:

Third-party administrators and vendors hired to effect, administer or enforce a transaction that Clients request or authorize; to develop or maintain software; or to perform marketing research.

Financial services entities, such as banks, credit unions, credit union service organizations, thrifts, thrift service organizations, insurance companies, or securities broker/dealers with which Harvest Capital has joint marketing agreements.

Harvest Capital will not share information about Clients with another company that may be used to make insurance underwriting or lending decisions about Clients unless Clients so directs Harvest Capital, or unless Harvest Capital tells Clients beforehand and gives Clients a chance to say no.

Other than what is described herein, Harvest Capital won't share information about Clients with third parties to market products to Clients, unless Harvest Capital tells Clients about it first, and give Clients a chance to say no.

Harvest Capital upholds these privacy principles throughout Harvest Capital and with our business partners. Companies with which Harvest Capital shares customer information are required to maintain the confidentiality of that information.

Harvest Capital will reaffirm this policy annually in writing, as long as Clients maintain an ongoing relationship with Harvest Capital. While this policy may change from time to time, Clients will be able to review updates online at www.harvestcapitalllc.com.