

Privacy Policy Statement

Investment advisers are required by law to inform their clients of their policies regarding privacy of client information. We are bound by professional standards of confidentiality that are even more stringent than those required by law.

Federal law gives the client the right to limit some but not all sharing of personal information. It also requires us to tell you how we collect, share, and protect your personal information. This information is also available on our website, www.harrisfin.com.

TYPES OF NONPUBLIC PERSONAL INFORMATION (NPI) WE COLLECT

We collect nonpublic personal information about you that is either provided to us by you or obtained by us with your authorization. This can include but is not limited to your Social Security Number, Date of Birth, Banking Information, Financial Account Numbers and/or Balances, Sources of Income, and Credit Card Numbers or Information. When you are no longer our client, we may continue to use your information only as described in this notice.

PARTIES TO WHOM WE DISCLOSE INFORMATION

All Investment Advisers may need to share personal information to run their everyday business. In the section below, we list the reasons that we may share your personal information:

- For our everyday business purposes – such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus;
- For our marketing – to offer our products and services to you;
- For our affiliate marketing - to offer related services to you.

If you are a new client, we may begin sharing your information on the day you sign our agreement. When you are no longer our client, we may continue to use your information as described in this notice. However, you can contact us at any time to limit our sharing. We will not sell your information at any time, nor will we share your information except as described in this notice.

PROTECTING THE CONFIDENTIALITY OF CURRENT AND FORMER CLIENT'S INFORMATION

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law, including computer safeguards and secured files and building.

FEDERAL LAW GIVES YOU THE RIGHT TO LIMIT SHARING – OPTING OUT

Federal law allows you the right to limit the sharing of your NPI by “opting-out” of the following: sharing for non-affiliates’ everyday business purposes – information about your creditworthiness; or sharing with affiliates or non-affiliates who use your information to market to you. State laws and individual companies may give you additional rights to limit sharing. We will not sell your information at any time, nor will we share your information except as described in this notice.

DEFINITIONS:

Affiliates – companies related by common ownership or control. They can be financial and non-financial companies;

Non-affiliates – companies not related by common ownership or control. They can be financial and non-financial companies.