

Privacy of Client Financial Information

Harvest Investment Consultants, LLC (referred to as “HIC”) maintains physical, electronic, and procedural safeguards that comply with federal standards to protect its clients’ nonpublic personal information (“information”). Through this policy and its underlying procedures, HIC attempts to secure the confidentiality of customer records and information and protect against anticipated threats or hazards to the security or integrity of customer records and information.

It is the policy of HIC to restrict access to all current and former clients’ information (i.e., information and records pertaining to personal background, investment objectives, financial situation, tax information/returns, investment holdings, account numbers, account balances, etc.) to those employees and affiliated/nonaffiliated entities who need to know that information in order to provide products or services in furtherance of the client’s engagement of HIC. In that regard, HIC may disclose the client’s information: (1) to individuals and/or entities not affiliated with HIC, including, but not limited to the client’s other professional advisors and/or certain service providers that may be recommended or engaged by HIC in furtherance of the client’s engagement of HIC (i.e., attorney, accountant, insurance agent, broker-dealer, investment adviser, account custodian, record keeper, etc.); (2) required to do so by judicial or regulatory process; or (3) otherwise permitted to do so in accordance with the parameters of applicable federal and/or state privacy regulations. The disclosure of

information contained in any document completed by the client for processing and/or transmittal by HIC to facilitate the commencement/continuation/termination of a business relationship between the client and/or between HIC and a nonaffiliated third party service provider (i.e., broker-dealer, investment adviser, account custodian, record keeper, insurance company, etc.), including, but not limited to, information contained in any document completed and/or executed by the client in furtherance of the client's engagement of HIC (i.e., advisory agreement, client information form, etc.), shall be deemed as having been automatically authorized by the client with respect to the corresponding nonaffiliated third party service provider.

HIC permits only authorized employees and affiliates who have signed a copy of HIC's Privacy Policy to have access to client information. Employees violating HIC's Privacy Policy will be subject to HIC's disciplinary process. Additionally, whenever HIC hires other organizations to provide services to HIC's clients, HIC will require them to sign confidentiality agreements and/or the Privacy Policy.

Should you have any questions regarding the above, please contact Michael J. Meily, Chief Compliance Officer.