

PRIVACY STATEMENT

FACTS

WHAT DOES HART CAPITAL MANAGEMENT, INC (“HCM”) DO WITH YOUR PERSONAL INFORMATION?

Why?

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

What?

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security number and income
- Assets and account balances
- Investment experience and risk tolerance

When you are *no longer* our customer, we continue to share your information as described in this notice.

How?

All financial companies need to share customers’ personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers’ personal information; the reasons HCM chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does HCM share?	Can you limit this sharing?
For our everyday business purposes. (Schwab and Tamarac)	Yes	No
For our marketing purposes.	No	We do not share
For joint marketing with other financial companies	No	We do not share
For our affiliates’ everyday business purposes— information about your transactions and experiences	No	We do not share
For our affiliates’ everyday business purposes— information about your creditworthiness	No	We do not share
For our affiliates to market to you	No	We do not share
For non-affiliates to market to you	No	We do not share

Is Sharing Necessary?

Sharing personal information with Schwab and Tamarac are necessary to manage our client portfolios.

Questions?

Call (888) 561-7007

Hart Capital Management, Inc

What we do

How does HCM protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include using a client portal for communication, computer safeguards and secured files and buildings.
How does HCM collect my personal information?	We collect your personal information, for example, when you <ul style="list-style-type: none"> ■ Open an account or enter into an investment advisory contract ■ Give us your income information or seek advice about your investments ■ Give us your contact information
Why can't I limit all sharing?	Federal law gives you the right to limit only <ul style="list-style-type: none"> ■ sharing for affiliates' everyday business purposes—information about your creditworthiness ■ affiliates from using your information to market to you ■ sharing for non-affiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under certain state law.</p>

Definitions

Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> ■ <i>HCM does not have any affiliates</i>
Non-affiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> ■ <i>These include Schwab and Tamarac</i>
Joint marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. <ul style="list-style-type: none"> ■ <i>HCM does not jointly market</i>