



### **Notice of Privacy Policy**

Robert Harrell, Incorporated (“RHI”) is required by the Securities and Exchange Commission (“SEC”) to disclose its privacy policy to all clients on an annual basis. The policy relates to “nonpublic personal information”. Nonpublic personal information can include Social Security number, employment information, asset, income, account balances, transaction history, and individual contact information. It is RHI’s practice to deal with nonpublic personal information using the following policy:

#### **Collection and Use of Client Personal Information**

The type of personal information RHI collects and shares depends on the service the client has with us. This information is given by the client at the beginning of the relationship. We use this information to administer client accounts.

#### **Sharing of Client Information**

RHI will share nonpublic personal information with its affiliates for our everyday business purposes. However, we will not share any nonpublic personal information with any nonaffiliated parties regarding any client without the consent or request of the client. This includes any former clients.

#### **However, the following limited exception may apply:**

When RHI retains a nonaffiliated vendor to provide support services, RHI does require that its nonaffiliated vendor provide certain levels of security and confidentiality to insure that RHI clients are protected.

#### **Information Security Procedures**

To protect client personal information from unauthorized access, RHI uses security measures that comply with federal law. These measures include computer safeguards, secured files and building. RHI restricts access to client information to only those employees who need to know that information. Employees are bound by RHI’s Code of Ethics and must protect the integrity and the confidential nature of client information.

As required by SEC regulations, clients will receive a copy of this policy annually or if there are any changes in the policy.

### **Client Disclosure Statement – Business Continuity Plan**

RHI plans to quickly recover and resume business operations after a significant business disruption (SBD) and respond by safeguarding our employees and property, making a financial and operational assessment, protecting RHI’s books and records, and allowing our customers to continue to transact business. In short, our company’s Business Continuity Plan (BCP) is designed to permit us to resume operations as quickly as possible, given the scope and severity of the SBD.

The BCP addresses: data back up and recovery; all mission critical systems; financial and operational assessments; alternative communications with customers, employees, and regulators; alternate physical location of employees; critical supplier, contractor, bank and counter-party impact; regulatory reporting; and assuring our customers prompt access to their funds and securities if we are unable to continue our business.

Our clients' custodial banks back up important records in geographically separate areas. While every emergency situation poses unique problems based on external factors, such as time of day and the severity of the disruption, it is RHI's objective to restore operations and assist our client's with any existing transactions and aid them with new transactions within a resumption time period. Your orders and requests for funds and securities could be delayed during this period.

In addition, the product sponsor maintains all records related to your investments and account holdings and backs up important records in accordance with their business continuity plan. For more information on their contingency plan, please contact the sponsor directly at the telephone number provided on your statements.

**Significant Business Disruptions:** RHI's plan takes into account two kinds Significant Business Disruptions, internal and external. Internal SBDs affect only the Company's ability to communicate and do business, such as a fire or loss electrical power in the office or building.

External SBDs prevent the operation of the securities markets or a number of firms, such as a terrorist attack, a natural disaster, or another event that causes a wide-scale, regional disruption in essential services.

**Internal SBDs:** In the event of a disruption in RHI's business operations due an internal SBD, RHI will attempt to continue to conduct business as usual by utilizing alternative communication methods (if available), such as the Internet, cell phones, etc., or by moving its operations to an alternative location.

If personnel or operations must be moved to an alternate location, RHI anticipates that it will resume regular operations as soon as personnel can access the alternate site.

**External SBDs:** In the event of a disruption in RHI's business operations due to an external SBD, RHI will attempt to continue to conduct business as usual by moving its operations to an alternative location outside the affected area, if possible, or by providing customers with alternative communication arrangements, as indicated below, to conduct business or to access their funds and securities.

RHI will attempt to resume business and keep its customers informed regarding relevant events to the best of its ability based on the circumstances.

In all cases, RHI will resume normal business operations as soon as it is able to do so, based on the type and the extent of the disrupting event.

If the significant business disruption is so severe that it prevents us from remaining in business, we will assure our customer's prompt access to their funds and securities.

**Communications:** In the event you are unable to reach the Company at our main number, please proceed as follows:

- Contact RHI at the following alternate telephone number: 1-512-349-9195
- Contact RHI at the following email address: rhi@harrell.com
- Access RHI's website at [www.harrell.com](http://www.harrell.com).
- Contact the custodial relationship directly at the number listed on your most recent statement.

**Contact information:** Any questions regarding RHI's Interruption Plans should be addressed to: William B. Harrell, Robert Harrell Incorporated, 8310 N Capital of Texas Highway, Bldg 1-320, Austin, TX 78731, 512-795-9100