



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.