

RHI

ROBERT HARRELL INCORPORATED

REGISTERED INVESTMENT ADVISER

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Privacy of Client Information

Information Collected and Shared

RHI's privacy policy statement is given to clients at the initial signing of the client contract and mailed or emailed with client consent once annually, if the policy is updated. The CCO will document the date the privacy policy was delivered to each client for each year if an annual delivery is required. RHI may collect information about clients from the following sources:

- Information received from client on applications, via other forms, or during conversations;
- Information about client's transactions with RHI or others; and
- Information provided by a consumer reporting agency.

Below are the reasons for which RHI may share a client's personal information:

- With specific third parties as requested by the client (see Sample 11);
- For everyday business purposes – such as to process client transactions, maintain client account(s), respond to court orders and legal investigations, or report to credit bureaus;
- For marketing by RHI – to offer RHI's products and services to clients;
- For joint marketing with other financial companies;
- For affiliates' everyday business purposes – information about client transactions and experience;
or
- For non-affiliates to market to clients (only where allowed).

If a client decides to close his or her account(s) or becomes an inactive customer, RHI will adhere to the privacy policies and practices as described in this manual, as updated.

Storing Client Information

RHI uses various methods to store and archive client files and other information. Third party services or contractors used have been made aware of the importance RHI places on both firm and client information security. RHI also restricts access to clients' personal and account information to those employees who need to know that information to provide products or services to its clients. In addition to electronic protection, procedural safeguards, and personnel measures, RHI has implemented reasonable physical security measures at its home office location.

The names of RHI's current and former access persons can be found in Exhibit 2.

In addition to RHI's listed access persons, any IT persons or other technical consultants employed at the firm may also have access to non-public client information at any time. An on-site or off-site server that stores client information, third-party software that generates statements or performance reports, or third-party client portals designed to store client files all hold the potential for a breach of non-public client information.

To mitigate a possible breach of the private information, RHI uses anti-virus BitDefender software on all computers and carefully evaluates any third-party providers, employees, and consultants with regard to their security protocols, privacy policies, and/or security and privacy training. All laptop computers are encrypted, should the device get stolen.