

U.S. CONSUMER PRIVACY NOTICE

| FACTS | What Does Harbour Trust & Investment Management 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 employment information Account balances and transaction history Assets and investment experience |
| | When you are <i>no longer</i> our customer, we continue to share your information as described in this notice. |
| How? | All financial companies need to share customer's personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customer's personal information; the reasons Harbour Trust & Investment Management Co. chooses to share; and whether you can limit this sharing. |

| Reasons we can share your personal information | Does Harbour Trust & Investment Management Co. share? | Can you limit this sharing? |
|---|--|-----------------------------|
| For our everyday business purposes— such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus | YES | NO |
| For our marketing purposes— to offer our products and services to you | YES | NO |
| For joint marketing with other financial companies | YES | NO |
| For our affiliates' everyday business purposes—information about your transactions and experiences | NO | WE DON'T SHARE |
| For our affiliates' everyday business purposes—information about your creditworthiness | NO | WE DON'T SHARE |
| For nonaffiliates to market to you | NO | WE DON'T SHARE |
| Questions? Call (888) 649-8969 or go to www.harbourtrust.com and click on "Contact Us" | | ick on "Contact Us" |

| Who we are | | | |
|--|--|--|--|
| Who is providing this notice? | HARBOUR TRUST AND INVESTMENT MANAGEMENT COMPANY (Harbour Trust) | | |
| What we do | | | |
| How does Harbour Trust 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 computer safeguards and secured files and buildings. Your information is accessible only to employees who need the information to provide products and services to you. | | |
| How does Harbour Trust collect my personal information? | We collect your personal information, for example, when you Open an Account or give us your contact information Make a wire transfer or tell us where to send the money Make deposits or withdrawals from your account | | |
| Why can't I limit all sharing? | Federal law gives you the right to limit only sharing for affiliates' everyday business purposes—information about your creditworthiness affiliates from using your information to market to you sharing for nonaffiliates to market to you State laws and individual companies may give you additional rights to limit sharing. | | |
| Definitions | | | |
| Affiliates | Companies related by common ownership or control. They can be financial and nonfinancial companies. | | |
| Nonaffiliates | Companies not related by common ownership or control. They can be financial and nonfinancial companies. — Harbour Trust does not share with nonaffiliates so they can market with you. | | |
| Joint marketing | A formal agreement between nonaffiliated financial companies that together market financial products or services to you. — Harbour Trust does not jointly market. | | |
| Other important information | | | |
| From time to time, policies and procedures may change due to changes in the law or in our operations, at which time we will notify you of these changes, as required by law. | | | |