

What Does Howard Capital Management (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?	<p>The types of personal information we collect and share depends on the service you have with us. This information can include:</p> <ul style="list-style-type: none"> ▪ Social security number ▪ Name and address ▪ Date of birth ▪ Income ▪ Employment information ▪ Risk tolerance
How?	All financial companies need to share clients' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their clients' personal information, the reasons Howard Capital Management chooses to share and whether you can limit this sharing.

<i>Reasons we may share your personal information</i>	<i>Does HCM Share?</i>	<i>Can you limit this sharing?</i>
For our everyday business purposes – such as to process your transactions and maintain your account(s), or respond to court orders and legal investigations	Yes	No, We only share the minimum necessary to process transactions on your behalf.
For our marketing purposes – to offer products and services that may benefit you	Yes	No, We only share the minimum necessary to offer services you may need.
For joint marketing with other financial companies	No	N/A - We don't share
For non affiliates to market to you	No	N/A - We don't share
For our affiliates' everyday business purposes – information about your transactions and experiences	No	N/A - We don't have any affiliates - We don't share
For our affiliates' everyday business purposes – information about your creditworthiness	No	N/A - We don't have any affiliates - We don't share

What we do

How does Howard Capital Management 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.
How does Howard Capital Management collect my personal information?	We collect your personal information, for example when you: <ul style="list-style-type: none">▪ Enter into an Investment Advisory contract▪ Give us your contact information▪ Seek advice about your account▪ Make deposits or withdrawals from your account▪ Provide your employment information
Why can't we limit all sharing?	Federal law gives you the right to limit only: <ul style="list-style-type: none">▪ Sharing for affiliates' everyday business purposes,▪ 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 non-financial companies. <ul style="list-style-type: none">▪ Howard Capital Management has no affiliates, thus we do not share your information
Nonaffiliates	Companies not related by common ownership or control. They can be financial and non-financial companies. <ul style="list-style-type: none">▪ Howard Capital Management does not share your information with nonaffiliates so they can market to you.
Joint marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. <ul style="list-style-type: none">▪ Howard Capital Management does not jointly market.

Questions? Call 1-310-473-9100 or email us at info@howardcapital.com