

# HARBOR ASSET

PRIVATE WEALTH

## Privacy and Data Collection Policies

Effective: 10/01/2025

We respect your right to privacy and have put in place security measures for your personal data, along with ensuring your personal data is managed in accordance with applicable data privacy regulations. No mobile opt-in or text message consent will be shared with third parties or affiliates.

This Privacy Policy governs the way Harbor Asset Private Wealth collects, uses, maintains and discloses information collected from users of the <https://www.harborassetpw.com> website.

This Privacy Policy applies to the site and all products and services offered by Harbor Asset Private Wealth. This Privacy Policy explains what information we collect through the website, when we collect it, how we use it, how it is secured and your rights in relation to your personal data.

### 1. WHAT INFORMATION WE COLLECT

#### Information You Provide

We may collect personal identification information from users in a variety of ways, including, but not limited to, when users visit our site, register on the site, subscribe to the newsletter, respond to a survey, fill out a form and in connection with other activities, services, features or resources we make available on our site. Users may be asked for, as appropriate, name, email address, mailing address and phone number. Users may, however, visit our site anonymously. We will collect personal identification information from users only if they voluntarily submit such information to us. Users can always refuse to supply personal identification information, except that it may prevent them from engaging in certain site-related activities.

#### Information Collected Automatically

In addition to the information, you provide to us directly, we may collect information about your use of the services. For example, we may collect:

Device information: such as your hardware model, IP address, other unique device identifiers, operating system version and settings of the device you use to access the services.

Usage information: such as information about the services you use, the time and duration of your use of the services and other information about your interaction with content offered through a service, and any information stored in cookies and similar technologies that we have set on your device.

Location information: such as your computer's IP address, your mobile device's GPS signal or information about nearby Wi-Fi access points and cell towers that may be transmitted to us when you use the services.

### Information From Other Sources

We may collect information, including personal data, from third parties and sources, such as our partners, advertisers and integrated services. If we associate or combine information from other sources with personal data that we collect through the site, we will treat this information as personal data in accordance with this policy.

## 2. HOW WE USE THE INFORMATION WE COLLECT

We use the information we collect for a variety of ways in providing our services, including the following:

### Operations

In the course of providing the services, we may collect information on our users' demographics, interests and behavior and analyze that data. We do this to better understand and serve our users, and to improve our products and services.

### Improvements To the Website & Personalized User Experience

We use information to understand and analyze the preferences and user behavior of visitors to this website. This allows us to improve the functionality of the service we provide and develop new services and features. All data used for this purpose is processed in an anonymized form. We may use information in the aggregate to understand how our users as a group use the services and resources provided on our site.

## **Communications**

We may use contact information to contact users of the website for administrative purposes, and with updates relating to the products and services we offer. We do send periodic emails and your email address may be used to send you information and updates pertaining to your needs for services you may be interested in. All our emails use common email best practices and are CAN SPAM compliant. You have the ability to opt out of any promotional communication as per the section below, under 'Your Rights'.

## **Web Cookies & Tracking Technology**

Our site may use "cookies" to enhance the user experience. A user's web browser places cookies on their hard drive for record-keeping purposes and sometimes to track information about them. The user may choose to set their web browser to refuse cookies, or to alert you when cookies are being sent. If they do so, note that some parts of the site may not function properly.

We may also use your location information to facilitate the delivery of targeted ads, promotions and offers to you, on behalf of ourselves, select business partners and advertisers, on and off the services.

This helps us to personalize our service, including:

- Remembering a user's information inputted on the website in previous visits, so that the user will not have to re-enter the information during subsequent visits.
- Providing personalized advertisements, content and information.
- Monitoring and analyzing the effectiveness of the website and third-party marketing activities.
- Monitoring aggregate site usage metrics such as total number of visitors to the website or pages viewed.
- Tracking your entries and submissions on the website.

## **3. HOW LONG WE HOLD YOUR DATA**

We will only hold your information for as long as is necessary for the purposes set out in this Privacy Policy. We may also retain log files for analyzation purposes—these log files are generally retained for a short period of time, except in cases where the information is used for website security, improving the website functionality, and in cases in which we are legally obligated to retain information for longer time periods.

## **4. HOW WE PROTECT YOUR DATA**

### **FOR WEBSITES WITH SSL CERTS**

We adopt appropriate data collection, storage and processing practices and security measures to protect against unauthorized access, alteration, disclosure or destruction of your personal information, username, password, transaction information and data stored on our site.

Sensitive and private data exchange between the site and its users happens over an SSL-secured communication channel and is encrypted and protected with digital signatures.

### **FOR WEBSITES WITHOUT SSL CERTS**

We take security very seriously and are committed to keeping your information safe. While we endeavor to ensure the security of our systems and the information we hold; no service is guaranteed to be completely secure. If you have any concern that your personal information has been put at risk, please get in touch right away.

## **5. WHEN YOUR INFORMATION IS SHARED WITH OTHERS**

We do not sell or rent personal identification information to others. We may share generic aggregated demographic information not linked to any personal identification information regarding visitors and users with our business partners, trusted affiliates and advertisers for the purposes outlined above. In addition, we may share personal information with trusted partners, when a user opts-in to a partner offer. We may use third-party service providers to help us operate our business and the site or administer activities on our behalf, such as sending out newsletters or surveys. We may share your information with these third parties for those limited purposes if you have given us your permission.

## **6. YOUR RIGHTS**

You have the right to request a copy of the information we hold on you, ask us to correct, delete or only use your information for certain purposes and you have the right to change your mind at any time and ask us to stop using your information. For example, unsubscribing to marketing emails or opting out of cookies.

The exceptions to these rights include: when access to personal data would reveal personal information about another individual, or if we are legally prevented from disclosing such information. In addition, we may retain data even if you withdraw your consent, where we can demonstrate that we have a legal requirement to process your data.

## **7. LINKS TO OTHER WEBSITES**

This website may contain links to other websites which are outside of our control and, as such, are not covered by this Privacy Policy. If you access another website via a link on this site, the operators of those sites may collect your information in accordance with their own privacy policies. You will need to read the Privacy Policy on that website to find out if/how they collect and/or use your information.

## **8. CHANGES TO THE TERMS OF THIS PRIVACY POLICY**

Harbor Asset Private Wealth has the discretion to update this privacy policy at any time. When we do, we will revise the updated date at the bottom of this page. We encourage users to frequently check this page for any changes to stay informed about how we are helping to protect the personal information we collect. You acknowledge and agree that it is your responsibility to review this Privacy Policy periodically and become aware of modifications.

## **9. HOW WE PROTECT OUR CLIENTS**

The [Customer Relationship Summary Form \(CRS\)](#) and the [Form ADV Part 2A](#), are firm brochures that registered investment advisors must file with the U.S. Securities and Exchange Commission (SEC) to provide details & important information to help clients make informed decisions about hiring an advisor.

## **10. HOW TO CONTACT US**

If you have any questions about this Privacy Policy, the practices of this site, or your dealings with this site, please contact us at 203-742-0505 or email us at [marti@harborassetpw.com](mailto:marti@harborassetpw.com)