

HARTFORD FINANCIAL MANAGEMENT, INC.

PRIVACY POLICY

Revised May 22, 2018

Hartford Financial Management, Inc. (also known as “HFM Wealth Management” or “HFM”) is committed to protecting your privacy. As you may know, we are required under federal law (and various state laws) to disclose to you our Privacy Policy, describing our firm’s collection, use, disclosure, retention and security of non-public personal information about you.

These laws present varying requirements for entities like HFM, depending on:

- The type of information, how it is gathered, how the information is used
- Whether HFM shares or discloses personal information about you to third parties.

Requirements differ depending on whether or not the third party is an affiliate of HFM. As of this notice, HFM has no operating affiliates, so HFM does not disclose any non-public personal information to any affiliates.

If this policy changes in a material way, the new version will be placed wherever it is currently offered and it will be delivered to applicable HFM clients. If you have any questions about this policy or any state requirements that may apply, please feel free to call us at 800-288-2418.

CATEGORIES OF INFORMATION WE MAY GATHER ABOUT YOU

Personal Information can include any information that identifies you or would enable someone to contact you. Some personal information is public, some is non-public.

- Non-Public Personal Information - You typically provide personal non-public information when you contact Hartford Financial Management, Inc. about investment advisory services. By collecting this data, we can better understand your financial needs and interests and provide you with more customized services. When the information relates to multiple accounts of one person, this Privacy Policy applies to all of them.

This information may include your:

- Name, address, email address, phone number
- Date of birth, Social Security or taxpayer identification number
- Occupation, income sources and amounts
- General personal, family, estate and insurance information
- Account numbers, balances, transaction or investment activity, other assets
- Account information at other institutions.

This information may come from:

Applications, forms, statements, general communications, or other sources of information that you provide to us, whether in writing, in person, by telephone, electronically, via your online activity, or by any other means.

HOW WE PROTECT THE CONFIDENTIALITY AND SECURITY OF YOUR PERSONAL INFORMATION

We restrict access to non-public personal information about you to our employees and those individuals, agents, or vendors who need to know that information to provide products or services to you and perform their respective duties on our behalf. HFM employees are trained and required to safeguard such information. We maintain physical, electronic and procedural measures to safeguard your personal information.

HOW WE HANDLE YOUR PERSONAL INFORMATION

We may only disclose information that we gather in accordance with this policy. HFM does not sell information about prospective, current or former clients to third parties.

Categories of Parties to Whom We Disclose Where You May Not Opt Out

We share certain information we gather about you with the following third parties, and, under federal law, you cannot opt out of these types of sharing:

- To entities or individuals that perform services for us or function on our behalf, including:
 - Financial service providers such as account custodians or broker-dealers for servicing your accounts, to process your transactions or maintain your accounts.
 - Entities that provide services for us or function on our behalf with tools, software, and online platforms for portfolio management, financial planning, reporting, risk tolerance assessment, compliance activities, report and document delivery, to keep you informed about financial services of interest, for delivery of HFM communications in the course of delivering our services.
 - Technical Support providers and data processing providers whose technical services include: data processing and delivery; network system, internet, and data function and security; protection of the integrity and confidentiality of HFM systems, records, and communications; and to protect against fraud, unauthorized transactions, or other liability.

In all such cases, we provide the third party with only the information needed to carry out its assigned duties and only for that purpose.

- In limited circumstances where we believe in good faith that we are permitted or compelled by law to do so (in order to cooperate with regulators or law enforcement authorities, or in the course of financial or compliance audits) we may provide certain information to third parties.
- With your express consent or at your direction in order to fulfill your instructions (such as with your accountant or lawyer or anyone who represents you in a fiduciary capacity), we will release your information when and as authorized at that time.

Category of Parties to Whom We Disclose Where You May Opt Out:

In order to Opt Out of the following category of information sharing, in advance, contact HFM Compliance at 800-288-2418

HFM may employ third-party service technology providers that enable HFM to deliver to you periodic newsletters, webinars, transmission of educational material, or other online activity to be accessed via the internet (unrelated to processing and servicing your financial transactions or management of your assets).

When you click on an HFM email link or website link in order to engage with certain material, information may be gathered about you by HFM or by the service provider providing the technology that allows us to deliver it to you. If you follow links or browse to websites other than HFM's, you become subject to the data/privacy practices of other websites, over which HFM has no control and about which HFM makes no representations.

Some information will be input and disclosed voluntarily by you, such as email address and name or other requested information you can choose to supply in order to participate. You are free to decline to supply the information at that time, but you may be unable to receive this category of service as a result.

Some information will be collected in an automated fashion.

Service technology providers that enable HFM to deliver to you a newsletter, webinar, or other content via the internet may use technologies to automatically collect information, in order to authenticate you as a user, to evaluate how the content is accessed and consumed, to customize content being offered to you, or to evaluate aggregated user trends. The information and methods include the use of Cookies, Pixels, and Analytics Services.

About Cookies and Pixels

Cookies are small pieces of data that are stored on your computer, mobile phone or any other device used to access the internet. Pixels are small code blocks on a website that allow another server to measure viewing of a webpage, often used in conjunction with cookies. Cookies store anonymous information, such as whether you viewed the site from your mobile device, or the site that you visited immediately prior to visiting the current site. Cookies, pixels, and similar technologies are not required for site functionality. However, refusing to accept cookies or pixels may make the use of a site less accessible.

About Analytics Services

This category of service providers may use third-party analytics tools, (such tools collectively referred to as "Analytics Services") to collect information about the usage of a website. Analytics Services collect information about how often users visit a site, what pages they visit when they do so, and what other sites they used prior to coming to a site, among other information. They may use the information to improve the site used. They collect the IP address assigned to you on the date you visit a site, along with other anonymized information (e.g., browser type and type of device used to visit the site), but not your name or other personally identifiable information. The Analytics Services' ability to use and share information about your visits to this site is restricted by their terms of use and privacy policies. You can prevent some analytics services from recognizing you on return visits to a site by disabling cookies on your browser.

To view the Privacy Policies of technology providers of this category that may be in use by HFM as of the date of this HFM Privacy Policy, see their websites (below).

If you would like a current list of this category of provider websites at any future date, please contact HFM Compliance at 800-288-2418.

www.ConstantContact.com/legal/privacy-statement

www.Skype.com See <https://privacy.microsoft.com/en-us/privacystatement/>

www.GotoMeeting.com See <https://secure.logmein.com/home/en/policies/privacy>

DISCONTINUED OR INACTIVE RELATIONSHIPS

If you decide to discontinue your relationship with HFM or your subscription to HFM communications, our Privacy Policy will continue to apply to you.

CHILDREN

Our services are not directed toward anyone under the age of 18. If a parent or guardian becomes aware that his or her child under the age of 18 has provided us with personally identifiable or non-public information, HFM should be contacted at 800-288-2418.

YOUR ADDITIONAL RIGHTS IF A CALIFORNIA RESIDENT

Residents of California have the right to request from us certain information with respect to the types of personal information we share with third parties for those third parties' direct marketing purposes (if applicable) and the identities of the third parties with whom the business has shared such information during the immediately preceding calendar year. To exercise your rights, you may make one request each year by contacting us at 800-288-2418. Your request should specify your full name and the email address you used when submitting personal information to us. California "Do Not Track" Disclosure: The HFM website is not capable of responding to "Do Not Track" signals from your internet browser(s).

YOUR ADDITIONAL RIGHTS IF A VERMONT RESIDENT

We do not share nonpublic personal financial information we collect about Vermont residents to non-affiliated third parties except for our everyday business purposes or as otherwise permitted by law. If you wish to revoke any authorization to share your nonpublic personal financial information, please contact HFM Compliance at 800-288-2418. Please note, however, that we will not be able to provide you with services without the ability to share this financial information.

INTERNATIONAL

HFM services are hosted in the United States. We make no representation regarding compliance with the privacy or personal data laws of any other country. Persons located in the European Union, Canada or elsewhere outside of the United States should be aware that information we collect may be transferred to and processed in the United States. By providing HFM with any information or by engaging with our website or email content, each user of HFM services (a) acknowledges that we are subject to the laws of the United States, (b) consents to the collection, processing, maintenance, and transfer of such information in and to the United States and other applicable territories in which the privacy laws may not be as comprehensive as or equivalent to those in the country where the user resides or is a citizen, and (c) waives any claims or rights that may arise under those laws.