



## **HC FINANCIAL ADVISORS, INC.**

### **Form ADV Part 2A Brochure**

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This brochure provides information about the qualifications and business practices of HC Financial Advisors, Inc. If you have any questions about the contents of this brochure, please contact the Firm's Chief Compliance Officer, Karla J. McAvoy, at telephone (925) 299-1800. The information in this brochure has not been approved or verified by the U.S. Securities and Exchange Commission or by any state authority.

The oral and written statements of an advisor provide information upon which a prospective client may base a determination as to whether or not to hire the advisor. You are encouraged to review this Brochure and Brochure Supplements for the Firm's associates who advise you for more information on the qualifications of the Firm and its employees.

The use of the term "registered investment adviser" and description of HC Financial Advisors, Inc. and/or our associates as "registered" does not imply a certain level of skill or training. Additional information about HC Financial Advisors, Inc. is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Click on the "Investment Adviser Search" link and then search for "Investment Adviser Firm" using the firm's IARD number, which is 110436.

## ITEM 2: MATERIAL CHANGES

The purpose of this page is to inform you of material changes to our brochure. If you are receiving this brochure for the first time, this section may not be relevant to you.

HC Financial Advisors, Inc. (“HC Financial”) reviews and updates our brochure at least annually to confirm that it remains current. We have made no material changes since the previous annual update to our brochure, dated January 1, 2020.

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## Index of ERISA Related Disclosures

HC Financial Advisors, Inc. (sometimes “HC Financial,” “we,” “our,” “us,” the “Firm” or “Advisor”) may provide investment management services to retirement plans governed by the Employee Retirement Investment Security Act (“ERISA”). ERISA regulations require that specific disclosures be made to the ERISA plan fiduciary that is authorized to enter into, or extend or renew, an agreement with the Firm to provide these services. The following Index identifies the disclosures required and the location where plan representatives may find them. It is intended to assist ERISA Plan representatives with compliance with the service provider disclosure regulations under section 408(b)(2) of ERISA. Any questions concerning this guide or the information provided regarding our services or compensation should be addressed to our Chief Compliance Officer at the number noted on the cover page of this ADV Part 2A.

Required Disclosure	Location of the Required Disclosure
Description of the services that Advisor will provide to covered ERISA plans	Item 4 of this Form ADV Part 2A and the paragraphs 1 and 7 of client plan’s investment management agreement with the Firm.
Statements that the services that Advisor will provide to covered ERISA plans will be as an ERISA fiduciary and registered investment adviser	Item 4 of this Form ADV Part 2A.
Description of the direct compensation to be paid to Advisor	Item 5 of this Form ADV Part 2A and paragraph 2 of the client plan’s investment management agreement with the Firm.
Description of the indirect compensation Advisor might receive from third parties in connection with providing services to covered ERISA plans, if any	Items 12 and 14 of this Form ADV Part 2A
Description of the compensation to be shared between Advisor and any third party or any affiliated entity, if any	Item 14 of this Form ADV Part 2A.
Compensation that Advisor will receive upon termination of its agreement to provide investment management services, if any	Item 5 of this Form ADV Part 2A.

## ITEM 4: ADVISORY BUSINESS

### Who we are

HC Financial is a financial planning and investment advisory firm that offers services on a fee only basis. We are based in Lafayette, CA, and have been serving clients throughout the Bay Area and beyond for over thirty years. Our principal officers are Stephen Biggs, Karla McAvoy, and Andrew Byron.

### Services we offer

HC Financial Advisors, Inc. is an investment advisory firm offering financial management to individuals and their families.

#### Our services include:

- To the extent that Client meets Advisor's minimum investment portfolio requirements, Advisor will also provide certain financial planning services on behalf of the Client consisting of the preparation of a financial plan that identifies the client's objectives and provides analysis of their assets, cash flow, insurance, income taxes, retirement needs, and estate planning needs. Financial plans are provided in writing; however, each plan may not contain all of the above components.
- Development and implementation of an investment plan that balances the client's specific need for growth and income with their tolerance for risk and portfolio volatility.
- Continuous monitoring of investments, markets, and the client's situation.
- Rebalancing of investments and help managing cash flows into or out of the client's investment accounts.
- Regular meetings with the client to review their goals and objectives, financial plans, and investments.
- Coordination with other professionals, including the client's estate planning attorney, accountant, and/or insurance agent to assist in confirming that the client's financial needs are met.
- Portfolio reporting, including quarterly investment appraisals, year-end portfolio performance, and analysis.

Clients can impose restrictions on investing in certain securities or types of securities. These restrictions should be noted by the client on the Investment Policy Statement and should be reviewed annually by the client to make sure they are still applicable.

To the extent any client is a retirement plan or other employee benefit plan subject to the Employee Retirement Income Security Act of 1974, as amended ("ERISA"), and depending upon the investment management services provided by us, the Firm may be considered a "fiduciary" under ERISA.

### Assets Under Management

As of December 31, 2020, we managed assets of \$479,840,525 on a discretionary basis. We do not manage assets on a non-discretionary basis.

## ITEM 5: FEES AND COMPENSATION

### Investment Management Services

The annual fee for investment management is based on the assets we manage. The fee includes both ongoing investment management and financial planning. We assess and collect our annual management fee in arrears (after our services are rendered). The fee is billed on the market value of the assets under management and is billed in quarterly installments based on the average daily balance of managed assets during the quarter billed. Market value includes all cash, money market balances, and the value of all assets managed in the account or supervised by the Firm. All assets in the account are included in the fee assessment unless specifically identified in writing for exclusion. No portion of our fee is calculated as a percentage of the capital gain or capital appreciation of assets.

The charge for investment management is:

- 1% for the first \$1,000,000 under management
- plus 0.75% for additional assets managed up to \$3,000,000
- plus 0.60% for additional assets managed up to \$5,000,000
- plus 0.50% for additional assets managed up to \$10,000,000
- assets managed above \$10,000,000 – negotiable

The minimum investment portfolio requirement is \$1,000,000.

The client's investment management fee to the Firm is determined in accordance with the above standard fee structure, with exceptions negotiated on a case-by-case basis at our discretion. Services provided for the above fees are for investment advice and quarterly reporting of asset holdings, valuations and performance reviews. The Firm, in its sole discretion, may negotiate to charge a different investment management fee based upon, among other criteria, anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, pre-existing client relationship, account retention and/or pro bono activities.

Clients customarily authorize HC Financial to deduct its quarterly investment advisory fee directly from their custodial account. This authorization is granted under the terms of the client's signed investment management agreement and the client's instructions to their custodian. Clients receive an invoice each quarter, which states our fee and how it is to be paid. In addition, clients receive a statement from their custodian, which shows their holdings and all contributions and withdrawals from their accounts. In these cases, it is the client's responsibility to verify the accuracy of the fee calculation, as the custodian will not determine whether the fee is properly calculated.

At the discretion of the Firm, clients may arrange to pay their fee directly to the Firm. Under this arrangement, payment is due upon client's receipt of our billing invoice.

#### Termination of Advisory Relationship

Clients may terminate the advisory relationship upon two week's written notice to the Firm. The Firm does not assess any fees related to termination but will be entitled to all management fees earned up to the date of termination. Any earned investment management fees owed to the Firm will be billed to the client, or where authorized, deducted from the client's account, on a pro rata basis determined on the amount of time expired in the billing period. Any unearned prepaid management fees will be refunded to the client. Any unearned prepaid financial planning or financial consultation fees will be refunded to the client. Any unpaid financial planning or consultation fees will be billed to the client for immediate payment or deducted from the client's retainer.

#### Use of Margin

We recommend that clients authorize the use of margin in their account. We utilize margin as a temporary measure for short-term cash needs rather than as an investment strategy. If you authorize the use of

margin, and margin is used for your portfolio, the market value of your account and corresponding fee payable by the client to HC Financial may be increased. We limit the risk inherent in using margin by using it solely as a short-term cash strategy rather than for investment purposes. In addition to understanding and assuming the additional principal risks associated with the use of margin, clients authorizing margin are advised of the potential conflict of interest whereby the client's decision to employ margin may correspondingly increase the management fee payable to HC Financial. Accordingly, the decision as to whether to employ margin is left to the sole discretion of client.

#### General Fee Disclosure

We believe our investment management fees are competitive with the fees charged by other investment advisors in the San Francisco Bay area for comparable services. However, comparable services may be available from other sources for lower fees than those charged by HC Financial. HC Financial receives no sales commissions on investment products purchased or sold for client accounts. We do not provide clients advice as to the tax deductibility of our advisory fees. Clients are directed to consult a tax professional to determine the potential tax deductibility of the payment of advisory fees.

#### Custodian and Brokerage Fees

Clients incur certain charges imposed by their custodians and other third parties such as custodial fees, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Additionally, clients will incur charges by the executing broker-dealer in the form of brokerage commissions and transaction fees on the investment transactions entered into for their account(s). All of these charges, fees, and commissions are in addition to Advisor's investment management fee.

Additional information about brokerage costs and services is provided in "Item 12: Brokerage Practices."

#### Fund Disclosures

Investment vehicles such as mutual funds, closed-end funds, exchange traded funds and alternative investment funds offer a wide range of objectives and strategies; the types of securities held by such funds vary widely depending upon the specific objectives and strategies of the vehicle. These investment vehicles incur brokerage and other expenses and their sponsors typically compensate themselves through fees charged directly to the fund. Clients indirectly pay for the expenses and advisory fees charged by the funds in which their assets are invested in addition to the advisory fee charged by HC Financial.

All such funds incur operating expenses in connection with the management of the fund. Investment funds pass some or all of these expenses through to their shareholders (the individual investors in the funds) in the form of management fees. The management fees charged vary from fund to fund. In addition, funds charge shareholders (individual investors in the funds) other types of fees such as early redemption or transaction fees. These charges also vary widely among funds. As a result, clients will still pay management fees and other, "indirect" fees and expenses as charged by each mutual fund (or other fund) in which they are invested.

Clients are provided a copy of a fund prospectus for each fund in which they invest by their custodian or by the fund sponsor rather than by HC Financial. As required by law, a prospectus represents the fund's complete disclosure of its management and fee structure. In addition, a fund's prospectus can be obtained directly from the fund.

#### Bond Disclosure

Clients whose assets are invested in bonds purchased directly from an underwriter or on the secondary market may pay a sales credit or sales concession on the trade (in lieu of a sales commission). The client's custodian may also impose a fee on the transaction as well.

## Engagement Letter

Occasionally, HC Financial Advisors, Inc. will sign an engagement letter with an hourly fee client. An engagement letter is typically used if the services to be provided are to extend over a period of time greater than one month or are to extend beyond a one-time financial plan or review.

## ITEM 6: PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

We do not receive performance fees for managing accounts.

## ITEM 7: TYPES OF CLIENTS

We work primarily with individuals and families. Our clients include professionals, business owners, retirees, widows, and families needing intergenerational financial planning. We also provide investment management services to endowment and pension plans. We require that new clients for investment management services maintain a minimum portfolio of \$1,000,000 under management with the Firm. However, we may waive that minimum at our sole discretion. We generally do not provide the full breadth of our financial planning services, including a written plan, to clients that do not meet the minimum portfolio size.

## ITEM 8: METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

We start our analysis by looking at the overall economy and establishing targets for various asset classes. We then use fundamental analysis in selecting individual investments. Our main sources of information come from financial newspapers and magazines, research materials prepared by others, corporate rating services, annual reports, prospectuses, filings with Securities and Exchange Commission, and company press releases.

Investments are selected to meet the goals and objectives of the client as well as to offer diversification, adequate cash flow, capital appreciation potential, and appropriate tax shelter. Most portfolios are diversified globally through multiple asset classes using individual stocks and bonds as well as mutual funds.

### Stocks

Our philosophy in managing stock portfolios is to look for what we perceive to be stable, well capitalized stocks with a record of steady growth in both sales and earnings that look attractively priced by various valuation measures. We keep in mind the client's need for safety, capital appreciation, and yield, and use these criteria in building an industry balanced portfolio. We purchase securities with the intention of holding them long term. We periodically monitor the stock holdings of all clients in order to keep informed about changes in sales, earnings, and events at each company.

### Mutual Funds

When clients do not have sufficient assets to purchase individual stocks or when clients prefer to use the additional diversification available with mutual funds, we use no load mutual funds to construct a portfolio. We select funds which we believe have a consistent, long term track record, stable management, low fees, and conservative investment policies. In order to build a diversified portfolio, we select funds with different investment philosophies such as value, growth, large cap, small/medium cap, and international.

### Fixed Income

Our primary concern in managing fixed income investments is safety of principal. We typically build portfolios of investment-grade bonds and government obligations with staggered maturities over a 1 to 8 year period. Our intent is to hold these investments until maturity. We employ this strategy in an effort to reduce the interest rate sensitivity of the portfolio and aid in safety of principal. However, adverse market conditions can potentially hinder these goals.



In addition to using individual bonds for the fixed-income portion of the portfolio, we will often use specialty bond funds to add further diversification. Examples of these funds include TIPS funds, asset-backed bond funds, global bond funds, and/or mortgage based funds.

#### Alternative Investments

Last, we will occasionally use a small percentage of alternative investments that feature daily liquidity, such as commodities and Real Estate Investment Trusts (REITs), for the purpose of adding non-correlated assets and reducing the overall volatility of the portfolio.

#### Illiquid Funds

HC Financial Advisors, Inc. may recommend illiquid mutual funds to clients based on factors that include but are not limited to:

- accreditation status and other qualifying requirements
- the level of interest clients express during meetings with HC Financial Advisors, Inc.
- whether the fund would offer diversification to the client

We consider these types of investments to carry a higher degree of risk than the funds we normally utilize. These securities are only available to accredited investors and may be assessed additional holding fees by the client's custodian. Any additional holding fees charged by the custodian will be disclosed to the client. Investments in such funds will only occur after conducting additional consultation with the client and after the client has approved of the investment and strategy for his/her portfolio.

All securities investments carry risk, including the risk that an investor may lose a part or all of his or her initial investment. Risk refers to the uncertainty that the actual return the investor realizes could differ from the expected return. Investors face a variety of risks either through direct ownership of securities or indirectly through securities owned by pooled investment vehicles such as mutual funds. Risks include the following: Interest rate risk, market risk, inflation risk, currency risk, reinvestment risk, business risk, liquidity risk, and financial risk. Due to these factors, we believe in building diversified portfolios of investments so as to spread out the risk among various asset classes, industry groups, individual stocks, and bonds.

Our portfolios have relatively low turnover rates. In an effort to reduce risk, we primarily invest in "blue chip" companies with quality balance sheets, a variety of products, and a track record of increased sales and earnings.

All investments involve different degrees of risk. You should be aware of your risk tolerance level and financial situation at all times. We cannot guarantee the successful performance of an investment and we are expressly prohibited from guaranteeing accounts against losses arising from market conditions.

### ITEM 9: DISCIPLINARY INFORMATION

Registered investment advisors are required to disclose any material facts regarding any legal or disciplinary actions that would be material to your evaluation of the investment advisor and each investment advisor representative providing investment advice to you. We have no information of this type to report.

### ITEM 10: OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

As a registered investment advisor, we are required to disclose when we or our principals have any other financial industry affiliations. Neither we nor our principals have outside business affiliations.

## ITEM 11: CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

### Code of Ethics

We have adopted a set of enforceable guidelines (Code of Ethics), which describes unacceptable conduct by HC Financial and our associated persons. Summarized, this Code of Ethics prohibits us from:

- placing our interests before yours,
- using nonpublic information gathered when providing services to you for our own gains, or
- engaging in any act, practice, or course of business that is, or might be considered, fraudulent, deceptive, manipulative, or in violation of any applicable law, rule, or regulation of a governmental agency.

Please contact us if you would like to receive a full copy of this Code of Ethics.

### Personal Trading for Associated Persons

We may buy or sell some of the same securities for you that we already hold in our personal account. We may also buy for our personal account some of the same securities that you already hold in your account. It is our policy not to permit our associated persons (or their immediate relatives) to trade in a way that takes advantage of price movements caused by your transactions.

We may restrict trading for a particular security for our accounts or those of our associated person if there is a pending trade in that security in a client account. Trades for our accounts (and those of our associated persons) will be placed as part of a block trade with client trades, or individually after client trades have been completed. Additional information about block trades is provided in the Aggregation of Orders section of “Item 12: Brokerage Practices.” When our trades are placed after our client trades, we may receive a better or worse price than that received by the client.

HC Financial and its associated persons may purchase or sell specific securities for their own account based on personal investment considerations without regard to whether the purchase or sale of such security is appropriate for clients.

All persons associated with us are required to report all personal securities transactions to us quarterly.

## ITEM 12: BROKERAGE PRACTICES

### The Custodian and Brokers We Use

We do not maintain custody of your assets that we manage, although we may be deemed to have custody of your assets if you give us authority to withdraw assets from your account (see “Item 15: Custody”). Your assets must be maintained in an account at a “qualified custodian,” generally a broker/dealer or bank. We recommend that our clients use Charles Schwab & Co., Inc. (“Schwab”), a registered broker/dealer, member SIPC or TD Ameritrade Institutional, a division of TD Ameritrade, Inc. member FINRA/SIPC (“TD Ameritrade”) as the qualified custodian. We are independently owned and operated and are not affiliated with Schwab or TD Ameritrade. Schwab or TD Ameritrade will hold your assets in a brokerage account and buy and sell securities when we instruct them to. While we recommend that you use Schwab or TD Ameritrade as custodian/broker, you will decide whether to do so and will open your account with Schwab or TD Ameritrade by entering into an account agreement directly with them. We do not open the account for you, although we may assist you in doing so.

Even though your account is maintained at Schwab or TD Ameritrade, we can still use other brokers to execute trades for your account as described below (see “Your Brokerage and Custody Costs”).

## How We Select Brokers/Custodians

We seek to recommend a custodian/broker who will hold your assets and execute transactions on terms that are, overall, most advantageous when compared to other available providers and their services. We consider a wide range of factors, including, among others:

- Combination of transaction execution services and asset custody services (generally without a separate fee for custody)
- Capability to execute, clear, and settle trades (buy and sell securities for your account)
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.)
- Breadth of available investment products (stocks, bonds, mutual funds, exchange-traded funds (ETFs), etc.)
- Availability of investment research and tools that assist us in making investment decisions
- Quality of services
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices
- Reputation, financial strength, and stability
- Prior service to us and our other clients
- Availability of other products and services that benefit us, as discussed below (see *“Products and Services Available to Us From Custodians”*)

## Your Brokerage and Custody Costs

For our clients’ accounts that Schwab and TD Ameritrade (“Custodians”) maintain, Custodians generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. In addition to commissions, Custodians can charge you a flat dollar amount as a “prime broker” or “trade away” fee for each trade that we have executed by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited (settled) into your custodial account. These fees are in addition to the commissions or other compensation you pay the executing broker-dealer. Because of this, in order to minimize your trading costs, we have Custodians execute most trades for your account. We have determined that having Custodians execute most trades is consistent with our duty to seek “best execution” of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above (see *“How We Select Brokers/Custodians”*).

## Products and Services Available to Us From Custodians

Custodians serve independent investment advisory firms like us. They provide us and our clients with access to its institutional brokerage— trading, custody, reporting, and related services—many of which are not typically available to Schwab or TD Ameritrade retail customers. Custodians also make available various support services. Some of those services help us manage or administer our clients’ accounts, while others help us manage and grow our business. Custodians support services generally are available

on an unsolicited basis (we don't have to request them) and at no charge to us. Following is a more detailed description of Custodians support services:

#### Services That Benefit You.

Schwab and TD Ameritrade's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Custodians include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Custodians' services described in this paragraph generally benefit you and your account.

#### Services That May Not Directly Benefit You.

Custodians also makes available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts. They include investment research, both that the Custodians own and that of third parties. We may use this research to service all or a substantial number of our clients' accounts, including accounts not maintained at either custodian. In addition to investment research, Custodians also makes available software and other technology that:

- Provide access to client account data (such as duplicate trade confirmations and account statements)
- Facilitate trade execution and allocate aggregated trade orders for multiple client accounts
- Provide pricing and other market data
- Facilitate payment of our fees from our clients' accounts
- Assist with back-office functions, recordkeeping, and client reporting

#### Services That Generally Benefit Only Us.

Custodians also offers other services intended to help us manage and further develop our business enterprise. These services include:

- Educational conferences and events
- Consulting on technology, compliance, legal, and business needs
- Publications and conferences on practice management and business succession
- Access to employee benefits providers, human capital consultants, and insurance providers

Custodians may provide some of these services themselves. In other cases, they will arrange for third-party vendors to provide the services to us. Custodians may also discount or waive its fees for some of these services or pay all or a part of a third party's fees. Custodians may also provide us with other benefits, such as occasional business entertainment of our personnel.

## Research

HC Financial receives access to research provided by "Research Brokers" at no cost when we utilize the Research Brokers' proprietary mutual funds in our clients' accounts. However, we do not utilize such funds in all client accounts. Therefore, there may be certain client accounts that benefit from the research, which did not contribute to the Research Broker providing the services. The receipt of research from any entity will not result in a reduction of our customary and normal research activities, and the value of such

information is, in our view, indeterminable. Nevertheless, the receipt of this research may be deemed the receipt of an economic benefit by HC Financial and may potentially create a conflict of interest between HC Financial and its clients.

## Aggregation of Orders

There are occasions on which portfolio transactions will be executed as part of concurrent authorizations to purchase or sell the same security for another client or one or more of our associated persons.

We may choose to block (aggregate) trades for your account with those of other client accounts and personal accounts of persons associated with HC Financial. When this occurs, an allocation statement is prepared specifying the client accounts that will participate and the amount each client is to receive, based on client investment goals and objectives. If the aggregated order is only partially filled, it is allocated on a pro rata basis based on the allocation statements. Clients will receive the same price per share for the security or mutual fund purchased. The price is calculated by averaging the price of all of the shares traded. Due to the averaging of price over all of the participating accounts, aggregated trades could be either advantageous or disadvantageous. Commission costs are not averaged. You will pay the same commission whether your trade is placed as part of a block or on an individual basis. The objective of the aggregated orders will be to allocate the executions in a manner that is deemed equitable to the accounts involved.

Our normal practice is to place trades on an individual account during the quarterly review process. Each client account is reviewed individually and orders are placed as the review for each client is completed. This process may be completed over the course of several weeks. Orders are aggregated only when we are taking action on a specific security for a significant number of clients.

## Directed Brokerage

You may instruct us to execute any or all securities transactions for your account with or through one or more broker/dealers designated by you. In these cases, you are responsible for negotiating the terms and conditions (including, but not limited to, commission rates) relating to all services to be provided by the broker/dealers and you are satisfied with the terms and conditions. We have no responsibility for obtaining the best prices or any particular commission rates for transactions with or through the broker/dealer in these situations. You recognize that you may not obtain rates as low as you might otherwise obtain if we had discretion to select broker/dealers other than those chosen by you. If you would like us to cease executing transactions with or through the designated broker/dealer, you must notify us in writing.

## ITEM 13: REVIEW OF ACCOUNTS

### Investment Management

All reviews of investment accounts are conducted on a quarterly basis or more frequently depending upon the client's situation and objectives and market conditions. Additional reviews may be triggered by changes in a number of areas including the client's goals and objectives, income and expenses, tax situation, family status, gifts and inheritance, health changes, or any other material change in the client's life. All managed accounts are reviewed on the same level: there are no different levels of reviews.

All reviews are initiated by Stephen Biggs, Chief Financial Officer. A secondary review is also generally performed by Karla McAvoy, Andrew Byron, or Abigail Hasling, Financial Planners.

Investment management clients receive quarterly reports on their investment portfolios which are being managed by HC Financial Advisors. In addition, they receive performance reports on an annual basis. Clients also receive periodic statements from the custodian for their brokerage account.

## Financial Planning

Client's financial plans are reviewed during the client's "Annual Review" meeting. Ideally, clients are asked to meet for a formal review on an annual basis. An annual review includes an update of the following financial information for a client: goals and objectives, net worth, cash flow analysis, income tax review, insurance review, estate planning review, and retirement forecast. Financial planning reports are provided to clients whenever they meet for their annual review.

Financial planners at the firm conduct the annual reviews with clients. Current planners are Karla J. McAvoy, Andrew Byron, and Abigail Hasling.

### ITEM 14: CLIENT REFERRALS AND OTHER COMPENSATION

We receive an economic benefit from Schwab and TD Ameritrade in the form of the support products and services they make available to us and other independent investment advisors whose clients maintain their accounts at Schwab or TD Ameritrade. These products and services, how they benefit us, and the related conflicts of interest are described above (see "Item 12: Brokerage Practices"). The availability to us of Custodians' products and services is not based on us giving particular investment advice, such as buying particular securities for our clients. We do not directly or indirectly compensate anyone for client referrals.

### ITEM 15: CUSTODY

We have limited custody of some of our clients' funds or securities when they authorize us to deduct our management fees directly from their account. A qualified custodian (generally a broker-dealer, bank, trust company, or other financial institution) holds clients' funds and securities. Clients will receive statements directly from their qualified custodian at least quarterly. The statements will reflect the client's funds and securities held with the qualified custodian as well as any transactions that occurred in the account, including the deduction of our fee.

Clients should carefully review the account statements they receive from the qualified custodian. When clients receive statements from us as well as from the qualified custodian, clients should compare these two reports carefully. Clients with any questions about their statements should contact us at the address or phone number on the cover of this brochure. Clients who do not receive their statement from their qualified custodian at least quarterly should also notify us.

HC Financial does not maintain physical custody of client funds or securities. We are unable to take even temporary possession of client assets for the purpose of transferring them to the client's account. Each client has a direct relationship with their custodian and is responsible for making deposits to and withdrawals from their account as necessary. HC Financial is given the authority to receive payment of its management fees directly from the account, but it is not authorized to make any other withdrawals or to transfer money out of the account to a third party.

### ITEM 16: INVESTMENT DISCRETION

As one of the conditions of managing your account, you are required to provide discretionary authority for us to manage your assets. Discretionary authority means that you are giving us a limited power of attorney to place trades on your behalf without your prior approval. This limited power of attorney does not allow us to withdraw money from your account, other than advisory fees if you agree to give us that authority.

You grant us discretionary authority by completing the following items:

- Sign a contract with us that provides us with discretionary authority. Any limitations to that authorization will be added to this agreement.

- Provide us with a limited power of attorney for us to place trades on your behalf. on the new account forms that are submitted to the broker/dealer acting as custodian for your account(s). Any limitations to the trading authorization will be added to this agreement.

If a client wishes to place limitations on our discretionary authority or authority to place trades for their accounts, those instructions should be written and part of either the investment advisory agreement or the most current Investment Policy Statement. Limitations would typically relate to large holdings or specific client wishes regarding socially responsible investment choices (such as no liquor stocks). We do not accept non-discretionary accounts for management.

## ITEM 17: VOTING CLIENT SECURITIES

HC Financial does not accept or have the authority to vote client securities. However, clients may call us if they have questions about a particular solicitation. HC Financial will not be deemed have proxy voting authority solely as a result of providing advice or information about a particular proxy vote to a client. Clients will receive their proxies or other solicitations directly from their custodian or a transfer agent.

### ERISA

For accounts subject to ERISA, an authorized plan fiduciary other than HC Financial will retain proxy voting authority.

### Mutual Funds

The investment adviser that manages the assets of a registered investment company (i.e., mutual fund) generally votes proxies issued on securities held by the mutual fund.

## Class Actions

HC Financial does not instruct or give advice to clients on whether or not to participate as a member of class action lawsuits and will not automatically file claims on the client's behalf. However, if a client notifies us that they wish to participate in a class action, we will provide the client with any transaction information pertaining to the client's account needed for the client to file a proof of claim in a class action.

## ITEM 18: FINANCIAL INFORMATION

We do not charge or solicit pre-payment of more than \$1,200 in fees per client six months or more in advance. We have never filed for bankruptcy and are not aware of any financial conditions that are reasonably likely to impair our ability to meet our contractual obligations to clients.



# HC Financial Advisors, Inc.

3685 Mt. Diablo Blvd., Suite 200 ■ Lafayette, California 94549

Phone: (925) 299-1800 ■ Fax: (925) 299-1812

E-mail: [info@hcfinancial.com](mailto:info@hcfinancial.com) ■ [www.hcfinancial.com](http://www.hcfinancial.com)

**Stephen Biggs**

**Karla McAvoy**

**Andrew Byron**

**Abigail Hasling**

**Gabriel Walters**

**Jane Lang**

## Form ADV, Part 2B Brochure Supplement

January 1, 2021

This brochure supplement provides information about Stephen Biggs, Karla McAvoy, Andrew Byron and Abigail Hasling that supplements the HC Financial Advisors, Inc. brochure. You should have already received a copy of that brochure. Please contact Firm's Chief Compliance Officer, Karla J. McAvoy, at telephone (925) 299-1800 if you did not receive our brochure or if you have any questions about the contents of this supplement. Additional information about Stephen Biggs, Karla McAvoy, Andrew Byron and Abigail Hasling is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Click on the "Investment Adviser Search" link and then search for "Individual" using the individual's CRD number Stephen Biggs (2379595), Karla McAvoy (6022751), Andrew Byron (6050315) and Abigail Hasling (6367906).



## **Description of Professional Designations Used in this Brochure Supplement\***

### **<sup>1</sup>Chartered Financial Analyst**

The Chartered Financial Analyst (“CFA”) designation is sponsored by CFA Institute. To earn a CFA charter, candidates must have four years of qualified investment work experience, become a member of CFA Institute, pledge to adhere to the CFA Institute Code of Ethics and Standards of Professional Conduct on an annual basis, apply for membership to a local CFA member society, and complete the CFA Program. The CFA Program is organized into three levels, each culminating in a six-hour exam. The three proctored course exams correspond to three 250-hour self-study levels. Completing the Program takes most candidates between two and five years. More information regarding the CFA is available at <https://www.cfainstitute.org>.

### **<sup>2</sup>CERTIFIED FINANCIAL PLANNER™**

The CERTIFIED FINANCIAL PLANNER™ and CFP® (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP® Board”). The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. The CFP® is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients.

To earn the credential, each CFP® candidate must have a bachelor’s degree (or higher) from an accredited college or university and three years of full-time personal financial planning experience. In addition, candidates must take the CFP® Certification examination and complete a CFP® board registered program or hold an accepted designation, degree, or license. Every two years, CFP® certificate holders must complete a minimum of 30 hours of continuing education. More information regarding the CFP® is available at <http://www.cfp.net/default.asp>.

### **<sup>3</sup>CHARTERED ALTERNATIVE INVESTMENT ANALYST (CAIA®)**

Chartered Alternative Investment Analyst designation is administered by the CAIA Association. CAIA® certification requirements:

- Successful completion of both the Level I and Level II exams of the CAIA® program.
- Become a member of the CAIA Association. To qualify for membership applicant must fulfill the following requirements:
- Pass the Level II exam within three years of passing the Level 1 exam.
- Hold a U.S. bachelor's degree or the equivalent, or have one year of professional experience, or alternatively have at least four years of professional experience.
- Submit payment for the annual CAIA Association membership fee.
- Agree on an annual basis to abide by the Member Agreement.

### **<sup>4</sup>CHARTERED RETIREMENT PLANNING COUNSELOR<sup>SM</sup>**

Individuals who hold the CRPC® designation have completed a course of study encompassing pre-and post-retirement needs, asset management, estate planning and the entire retirement planning process using models and techniques from real client situations. The program is designed for approximately 120-150 hours of self-study. The program is self-paced and must be completed within one year from enrollment.

## STEPHEN BIGGS

### ITEM 2 - EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

**Stephen Biggs**, Chief Financial Officer, Chief Investment Officer, Principal, b. 1967

#### *Education:*

- San Diego State University, San Diego, CA
  - BS; Business Administration - Management, 1993
  - MS; Business Administration - Finance, 1996

#### *Business Background:*

- HC Financial Advisors, Inc.
  - Chief Financial Officer, Chief Investment Officer, Principal, 01/2012 - present
  - Equity Analyst/Portfolio Manager, 09/2008 - 01/2012
- Zacks & Company, Senior Equity Analyst, 12/2006 - 9/2008
- Zacks Investment Research, Senior Equity Analyst, 4/2003 - 12/2006

#### *\*Professional Designations:*

- <sup>1</sup>Chartered Financial Analyst (CFA) - 1999
- <sup>2</sup>CERTIFIED FINANCIAL PLANNER™ (CFP®) – 2012
- <sup>3</sup>Certified Alternative Investment Analyst<sup>SM</sup> (CAIA<sup>SM</sup>) - 2019

### ITEM 3: DISCIPLINARY INFORMATION

Registered investment advisers are required to disclose any material facts regarding any legal or disciplinary actions that would be material to your evaluation of each investment adviser representative providing investment advice to you. Stephen Biggs has no information of this type to report.

### ITEM 4: OTHER BUSINESS ACTIVITIES

Stephen Biggs' only business is providing investment advice through HC Financial.

### ITEM 5: ADDITIONAL COMPENSATION

Stephen Biggs' only compensation comes from his regular salary and ownership of HC Financial.

### ITEM 6: SUPERVISION

Karla McAvoy as a Principal of HC Financial supervises all employees. She can be reached by calling (925) 299-1800.

# KARLA MCAVOY

## ITEM 2 - EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

**Karla McAvoy**, Chief Compliance Officer, Secretary, Financial Planner, Principal, b. 1964

### *Education:*

- BA - Economics; University of California, Davis, 1986
- MBA - Business Administration; Santa Clara University, 2001
- CFP Study - UCLA/Golden Gate University, 02/2002 - 09/2007

### *Business Background:*

- HC Financial Advisors, Inc.
  - Secretary, 03/2015 - present
  - Chief Compliance Officer, Principal, 01/2012 - present
  - Financial Planner, 08/2008 - present
- Self-Employed, Financial Planning/Consulting, 9/2007 - 07/2008
- UCLA/Golden Gate University, Student, 02/2002 - 09/2007
- Self-Employed, Software Consultant/Training, 01/2001 - 01/2002
- PeopleSoft, Regional Director of Education, 08/1995 - 12/2000

### *\*Professional Designations:*

- <sup>2</sup>CERTIFIED FINANCIAL PLANNER™ (CFP ®) - 2012

## ITEM 3: DISCIPLINARY INFORMATION

Registered investment advisers are required to disclose any material facts regarding any legal or disciplinary actions that would be material to your evaluation of each investment adviser representative providing investment advice to you. Karla McAvoy has no information of this type to report.

## ITEM 4: OTHER BUSINESS ACTIVITIES

Karla McAvoy's only business is providing investment advice through HC Financial.

## ITEM 5: ADDITIONAL COMPENSATION

Karla McAvoy's only compensation comes from her regular salary and ownership of HC Financial.

## ITEM 6: SUPERVISION

Karla McAvoy as a Principal of HC Financial supervises all employees. She can be reached by calling (925) 299-1800.

## **ANDREW BYRON**

### **ITEM 2 - EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE**

**Andrew Byron**, President, Financial Planner, Principal, b. 1957

*Education:*

- MBA - Business Administration; Santa Clara University, 1985
- BA - English/Religion; St. Olaf College, 1979

*Business Background:*

- HC Financial Advisors, Inc.
  - President, 03/2015 - present
  - Vice President, Secretary, 01/2012 - 03/2015
  - Financial Planner, Principal, 10/2011 - present
- Advantek Taping Systems, President, Sales Director of Americas, 05/1995 – 09/2011

*\*Professional Designations:*

- <sup>2</sup>CERTIFIED FINANCIAL PLANNER™ (CFP ®) - 2014

### **ITEM 3: DISCIPLINARY INFORMATION**

Registered investment advisers are required to disclose any material facts regarding any legal or disciplinary actions that would be material to your evaluation of each investment adviser representative providing investment advice to you. Andrew Byron has no information of this type to report.

### **ITEM 4: OTHER BUSINESS ACTIVITIES**

Andrew Byron's only business is providing investment advice through HC Financial.

### **ITEM 5: ADDITIONAL COMPENSATION**

Andrew Byron's only compensation comes from his regular salary and ownership of HC Financial.

### **ITEM 6: SUPERVISION**

Karla McAvoy as a Principal of HC Financial supervises all employees. She can be reached by calling (925) 299-1800.

## **ABIGAIL HASLING**

### **ITEM 2 - EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE**

**Abigail Hasling**, b. 1994

*Education:*

- BS – Personal Financial Planning; Texas Tech University, 2016

*Business Background:*

- HC Financial Advisors, Inc., Financial Advisor, 05/2019 - present
- Howard Financial Services
  - Associate Wealth Manager, 01/2017 - 04/2019
  - Intern, 05/2016 – 08/2016
- Merrill Lynch
  - Client Associate, 07/2015 – 05/2016
  - Client Associate, 07/2014 – 05/2015

*\*Professional Designations:*

- <sup>2</sup>CERTIFIED FINANCIAL PLANNER™ (CFP ®) - 2018

### **ITEM 3: DISCIPLINARY INFORMATION**

Registered investment advisers are required to disclose any material facts regarding any legal or disciplinary actions that would be material to your evaluation of each investment adviser representative providing investment advice to you. Abigail Hasling has no information of this type to report.

### **ITEM 4: OTHER BUSINESS ACTIVITIES**

Abigail Hasling's only business is providing investment advice through HC Financial.

### **ITEM 5: ADDITIONAL COMPENSATION**

Abigail Hasling's only compensation comes from her regular salary through HC Financial.

### **ITEM 6: SUPERVISION**

Karla McAvoy as a Principal of HC Financial supervises all employees. She can be reached by calling (925) 299-1800.

## **GABRIEL WALTERS**

### **ITEM 2 - EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE**

**Gabriel Walters**, Associate Financial Planner, Principal, b. 1983

#### *Education:*

- MA – Organizational Leadership, Regent University, 2006
- MA – Divinity Practical Theology, Regent University, 2009
- BA – Pastoral Studies, Patton University, 2009

#### *Business Background:*

- HC Financial Advisors, Inc., Associate Financial Planner, 01/2016 – present
- Vantage Wealth Management, Client Service, 08/2015 – 11/2015
- Sierra Pacific Financial Advisors, Paraplanner, 12/2014 – 02/2015
- NATIXIS Global Asset Management, Document Retention, 02/2013 – 04/2014

#### *\*Professional Designations:*

- <sup>2</sup>CERTIFIED FINANCIAL PLANNER™ (CFP®) - 2019
- <sup>4</sup>Chartered Retirement Planning Counselor<sup>SM</sup> (CRPC®) - 2016

### **ITEM 3: DISCIPLINARY INFORMATION**

Registered investment advisers are required to disclose any material facts regarding any legal or disciplinary actions that would be material to your evaluation of each investment adviser representative providing investment advice to you. Gabriel Walters has no information of this type to report.

### **ITEM 4: OTHER BUSINESS ACTIVITIES**

Gabriel Walters' only business is providing investment advice through HC Financial.

### **ITEM 5: ADDITIONAL COMPENSATION**

Gabriel Walters' only compensation comes from his regular salary and ownership of HC Financial.

### **ITEM 6: SUPERVISION**

Karla McAvoy as a Principal of HC Financial supervises all employees. She can be reached by calling (925) 299-1800.

## **JANE LANG**

### **ITEM 2 - EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE**

**Jane Lang**, b. 1964

*Education:*

- MBA – Finance/Marketing; St. Mary’s College, 1996
- BA – Economics, U.C. Davis, 1987

*Business Background:*

- HC Financial Advisors, Inc., Client Service Representative, 10/2018 - present
- Presidio Vista Properties, V.P. Operations & Marketing, 10/2014 – 07/2018
- JBL Consulting/Blue Chair Group, Principal, 2011 – 2014
- Hara Bara, VP Business Development, 2009 – 2011
- Cisco Systems, Director, Sales Operations, 1996 - 2002

### **ITEM 3: DISCIPLINARY INFORMATION**

Registered investment advisers are required to disclose any material facts regarding any legal or disciplinary actions that would be material to your evaluation of each investment adviser representative providing investment advice to you. Jane Lang has no information of this type to report.

### **ITEM 4: OTHER BUSINESS ACTIVITIES**

Jane Lang’s only business is providing investment advice through HC Financial.

### **ITEM 5: ADDITIONAL COMPENSATION**

Jane Lang’s only compensation comes from her regular salary through HC Financial.

### **ITEM 6: SUPERVISION**

Karla McAvoy as a Principal of HC Financial supervises all employees. She can be reached by calling (925) 299-1800.

## PRIVACY NOTICE

This is the privacy & cookies policy of HC Financial Advisors, Inc.

We respect your privacy and are determined to protect your personal data. The purpose of this privacy notice is to inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from). We'll also tell you about your privacy rights and how the data protection law protects you.

### WHAT IS THE PURPOSE OF THIS PRIVACY NOTICE?

This privacy notice aims to give you information on how we collect and process your personal data through your use of our website. This website is not intended for children and we do not knowingly collect data relating to children. You must read this privacy notice together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

### DATA CONTROLLER

HC Financial Advisors, Inc. is the controller and responsible for your personal data (collectively referred to as "HC Financial", "we", "us" or "our" in this privacy notice). Our contact details are 3685 Mt. Diablo Boulevard, Suite 200, Lafayette CA 94549 or [info@hcfinaancial.com](mailto:info@hcfinaancial.com). For all data matters contact the Data Controller at [info@hcfinaancial.com](mailto:info@hcfinaancial.com).

HC Financial Advisors, Inc. is the controller and responsible for our website.

### THIRD-PARTY LINKS OUTSIDE OF OUR CONTROL

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements.

When you leave our website, we encourage you to read the privacy notice of every website you visit.

### 1 - THE PERSONAL DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together:

- \* Identity Data includes first name, last name, title, country
- \* Contact Data includes email address, affiliate payout email address (if applicable)

We also collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offenses.

### IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect your personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.



## 2 - HOW WE COLLECT YOUR PERSONAL DATA

You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- \* Apply for our services;
- \* Sign up for our newsletter.

## 3 - HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

### Performance of Contract

This means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

### Legitimate Interest

This means the interest of our business in conducting and managing our business to enable us to give you the best service and the most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

### Comply with a legal or regulatory obligation

This means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting [info@hcfincial.com](mailto:info@hcfincial.com).

## 4 - PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below a description of all the ways we plan to use your personal data, with the legal basis we rely on to do so.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us at [email address] if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out below.

**Purpose/Activity** - To register you as a new customer

**Type of data** - (a) Identity & (b) Contact

**Lawful basis for processing including basis of legitimate interest** - Performance of a contract with you & Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms:

### PROMOTIONAL OFFERS FROM US

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services and offers may be relevant for you.

You will receive marketing communications from us if you have requested information from us or purchased services from us, if you have not opted out of receiving that marketing.

## THIRD-PARTY MARKETING

We will get your express opt-in consent before we share your personal data with any company outside HC Financial Advisors, Inc. for marketing purposes.

## OPTING OUT

You can ask us or third parties to stop sending you marketing messages at any time by contacting [info@hcfinancial.com](mailto:info@hcfinancial.com) at any time. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service purchase or experience or other transactions.

## COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookie Policy below in Section 9.

## CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact [info@hcfinancial.com](mailto:info@hcfinancial.com).

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 5 - WHO WE SHARE YOUR PERSONAL DATA WITH

We may have to share your personal data with the parties set out below for the purposes set out in paragraph 4 above.

## EXTERNAL THIRD PARTIES SERVICE

\* Professionals including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## 6 - DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 7 - DATA RETENTION

We will only retain your personal data for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other

means, and the applicable legal requirements.

By law we have to keep basic information about our customers (including contact, identity, financial and transaction data) for six years after they cease being customers, for tax purposes.

In some circumstances you can ask us to delete your data: see Your Legal Rights below for further information.

In some circumstances we may anonymize your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## 8 - YOUR LEGAL RIGHTS

Unless subject to an exemption under the data protection laws, you have the following rights with respect to your personal data:

- \* The right to request a copy of the personal data which we hold about you;
- \* The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- \* The right to request your personal data is erased where it is no longer necessary to retain such data;
- \* The right to withdraw your consent to the processing at any time, where consent was the lawful basis for processing your data;
- \* The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller (known as the right to data portability) where applicable, i.e. where our processing is based on consent or is necessary for the performance of our contract with you or where we process your data by automated means;
- \* The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- \* The right to object to our processing of personal data where applicable, i.e. where processing is based on our legitimate interests (or in performance of a task in the public interest/exercise of official authority), direct marketing or processing for the purposes of scientific/historical research and statistics.

If you wish to exercise any of the rights set out above, please contact us at [info@hcfinancial.com](mailto:info@hcfinancial.com).

### NO FEE REQUIRED – WITH SOME EXCEPTIONS

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable admin fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## 9 - INFORMATION ABOUT OUR USE OF COOKIES

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. By continuing to browse the site, you are agreeing to our use of cookies.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

We use the following cookies:

\* **Strictly necessary cookies.** These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website.

\* **Analytical/performance cookies.** They allow us to recognize and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

\* **Targeting cookies.** These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

You block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

## 10 - CHANGES TO THIS NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

This version was last updated on January 1, 2019 and historic versions can be obtained by contacting us.

Please keep us informed if your personal data changes during your relationship with us. It is important that the personal data we hold about you is accurate and current.

## 11 - QUERIES, REQUESTS OR CONCERNS

To exercise all relevant rights, queries or complaints in relation to this policy or any other data protection matter between you and us, please in the first instance contact us at [info@hcfincial.com](mailto:info@hcfincial.com).