



**FORM ADV PART 2A APPENDIX 1 – ICA PLATFORM PROGRAM  
WRAP FEE BROCHURE**

**Item 1 – Cover Page**

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This brochure provides information about the qualifications and investment advisory business practices of Harbor Financial Services, LLC. Level. If you have any questions about the contents of this brochure, please contact us at 888-397-7358. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any state securities authority.

Additional information about our investment advisory business is also available on the Internet at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can view our information on this website by searching for "Harbor Financial Services, LLC." You can also search using the Firm's CRD number. The CRD number for the Firm is **25700**.

Registration as an investment adviser does not imply a certain level of skill or training.

## Item 2 – Material Changes

This section describes the material changes to our Form ADV since our last annual ADV2A Disclosure Brochure dated November 2, 2020.

Item 4 Advisory Business was revised to update firm ownership to Level Group, LLC.,

Item 5 Fees and Compensation were revised to update Harbor assets under management as of 12/31/2020.

In lieu of providing advisory clients with an updated Disclosure Brochure each year, we typically provide existing clients with this summary describing any material changes occurring since the last annual update. We will deliver the Disclosure Brochure or summary each year to existing clients within 120 days of the close of our fiscal year. Clients wishing to receive a complete copy of our then-current Disclosure Brochure may request a copy at no charge by contacting our Client Services department at 888-397-7358. Our Disclosure Brochure is also available through the SEC's Investment Adviser Public Disclosure website at <https://adviserinfo.sec.gov/>, SEC# 801-65811, upon request through your financial advisor, or on our public website: <http://www.harborfs.com/disclosures.html>.

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## Item 4 – Services, Fees and Compensation

Harbor Financial Services, LLC (referred to as “HFS”, the “Firm”, “us” and “we” in this document) is an investment adviser registered with the United States Securities and Exchange Commission (“SEC”) and has developed and sponsors the ICA Platform Program (referred to as the “Program”). Participants in the Program must be advisory clients of HFS to access this wrap-fee program. The following bullets provide basic background regarding our Firm.

- The Firm has been registered as an investment adviser since 2006.
- The Firm is owned and controlled by Level Four Group, LLC. With our home office based in Mobile Alabama, we are also a registered broker dealer member of the Financial Industry Regulatory Authority Inc. (“FINRA”) and the Securities Investor Protection Corporation (“SIPC”), a licensed insurance agency, and a municipal securities dealer registered with the Municipal Securities Rulemaking Board (“MSRB”).
- We provide fee-only investment advisory services through HFS. The nature and extent of the specific services provided to clients, including you, will always depend on each client’s financial status, objectives and needs, time horizons, concerns, expectations and risk tolerance.
- HFS Advisory Representatives and HFS branch offices may use marketing names or other names that are held out to the public. Such names are known as “doing business as” names. The purpose of using a name other than HFS is for the Advisory Representative to create a brand that is specific to the Advisory Representative and/or branch, but separate from HFS. While HFS allows its Advisory Representatives to use a name other than HFS, the Advisory Representative must disclose on advertising and client correspondence that advisory services are offered through HFS.

HFS provides investment advisory services other than the Program described in this brochure including services through other wrap-fee programs. A description of all fee-based investment advisory services provided by HFS is available in our [ADV2A Disclosure Brochure](#).

Some HFS Advisory Representatives may also provide securities advice as registered representatives of HFS, a broker/dealer, member of the Financial Industry Regulatory Authority (“FINRA”) and Securities Investors Protection Corporation (“SIPC”). In that separate capacity as registered representatives, HFS’ Advisory Representatives may charge commissions on a per-transaction basis when implementing their advice on behalf of clients (see Item 9 of this brochure for more details).

When making the determination of whether one of the advisory programs available through HFS is appropriate for their needs, clients should bear in mind that fee-based accounts, when compared with commission-based accounts, often result in lower costs during periods when trading activity is heavier, such as the year an account is established. However, during periods when trading activity is lower, such arrangements may result in a higher annual cost for transactions. Thus, depending on a number of factors, the total cost for transactions under a fee account versus a commission account can vary significantly. Some such factors are account size, amount of turnover, type and quantities of securities purchased or sold, commission rates and the client’s tax situation.

**Client Obligations.** In performing its services, HFS shall not be required to verify any information received from the client or from the client’s other professionals, and is expressly authorized to rely thereon. Moreover, each client is advised that it remains his/her/its responsibility to promptly notify HFS if there is ever any change in his/her/its financial situation or investment objectives for the purpose of reviewing/evaluating/revising HFS’ previous recommendations and/or services.

Clients should have a conversation with their Advisory Representative and read this brochure carefully as it explains, in detail, the Program.

### **ICA Platform Program**

Through the Program, HFS provides investment management (also known as asset management) services which are defined

as providing continuous investment advice to a client and making investments for the client based on the individual needs of the client. Through this service, HFS offers a customized and individualized investment program for clients.

This Program has been developed through an arrangement with Raymond James & Associates ("RJ") whereby HFS utilizes RJ's ICA platform. Program accounts are established at HFS in its capacity as a registered broker/dealer. Clearing, custody and other brokerage services are provided by RJ for accounts established through the Program. Therefore, clients will be required to establish a brokerage account(s) through HFS on RJ's ICA platform.

HFS will manage each client's individual account(s) based on the individual needs of the client. Pursuant to each client's specific investment objectives, securities held in Program accounts will generally include mutual funds, Exchange Traded Funds (ETFs), stocks, bonds, options or other investments. HFS may limit its discretion with respect to the client account and the securities eligible to be purchased for the client account.

- **ICARM: We offer the ICA Rep Managed Account ("ICARM")**, an investment advisory account, on a non-discretionary or discretionary basis, provided certain qualifications are met. For non-discretionary accounts, we will contact you prior to executing any transactions. For discretionary accounts, your Advisory Representative may decide which securities and the amount of securities to be purchased/sold. Once the initial portfolio is constructed, you will be provided with ongoing investment advice and monitoring of your securities holdings by your Advisory Representative. ICARM offers you the ability to pay an asset based advisory fee in an account provided through our registered broker dealer (Harbor Financial Services, LLC).
- **ICACM: We also offer the ICA Capital Management Account ("ICACM")**, a discretionary investment advisory account with a sub-advisor appointed as portfolio manager. When using Sub-advisers selected by HFS, HFS introduces clients to investment managers who provide discretionary management of model portfolios of equity and/or fixed income securities.

Your Advisory Representative is still responsible for communicating with you and gathering all client information. When your account(s) are managed using models, investment selections are based on the underlying model and we do not develop customized (or individualized) portfolio holdings for you. However, the determination to use a particular model or models is always based on your individual investment goals, objectives and mandates. Various model portfolios are developed by sub-advisors, but generally speaking, portfolios will be designed on the following objectives:

- Income with Capital Preservation
- Income and Moderate Growth,
- Growth and Income
- Growth, and
- Aggressive Growth

You will be provided with ongoing investment advice and monitoring of model portfolios.

### **Suitability and Investment Strategy**

Our Advisory Representatives will work with each Program client to obtain information needed to determine the client's financial situation and investment objectives. Accounts are managed on the basis of each client's financial situation and investment objectives.

Clients shall have the ability to impose reasonable restrictions on the management of their accounts, including the ability to instruct HFS not to purchase certain securities. Client's beneficial interest in a security does not represent an undivided interest in all the securities held by the custodian, but rather represents a direct and beneficial interest in the securities which comprise the account. This means the client will be the sole owner of all securities held in their accounts. A separate account is maintained for each client with the custodian and clients retain right of ownership of the account (e. g. right to withdraw securities or cash, exercise or delegate proxy voting, and receive transaction confirmations).

Your Advisory Representative will assist you in determining your objective(s), investment strategy, and investment suitability, prior and subsequent to opening a Program account. At least annually, HFS contacts each individual client to determine whether their financial situation or investment objectives have changed, or if the client wants to impose and/or modify any reasonable restrictions on the management of accounts managed. HFS shall be reasonably available to consult with individual clients relative to the status of their accounts.

Clients must advise HFS of any changes in their investment objective(s) and/or financial situation. HFS' services are provided based on the individual needs of the individual client. Clients are given the ability to impose restrictions on their accounts including specific investment selections and sectors.

### **Brokerage, Clearing and Custody**

If you participate in the Program, you will be required to establish an account with RJA, member FINRA/SIPC, an unaffiliated SEC-registered broker-dealer. If you do not direct our firm to execute transactions through RJA, we reserve the right to not accept your account. Not all advisers require their clients to direct brokerage. Since you are required to use RJA, we may be unable to achieve the most favorable execution of your transactions. We believe that RJA provides quality execution services based on several factors, including but not limited to the ability to provide professional services, reputation, experience and financial stability.

In general, HFS may be limited in the broker/dealer or custodians that it is allowed to use due to HFS' dual registration and clearing relationship with RJA. HFS may limit or restrict the broker/dealer or custodial platforms for its registered representatives that are also independently licensed due to its duty to supervise the transactions implemented by these individuals.

### **Program Fees**

The annual investment advisory fee charged to Program accounts will not exceed 2.5% of the assets held in the account on an annual basis. Since the annual fee is negotiable with the client depending on the market value of the account, asset types, the client's financial situation and trading activity, advisory fees elected for your account are documented in your client agreement. In the Program, you pay the investment advisory fee and do not pay transaction charges associated with trade execution. However, HFS may charge a higher fee for ICA Platform Managed accounts to cover the transactions initiated in the accounts.

The annual fee shall be divided and payable quarterly in advance through a direct debit in your account. Fees are based on the account's asset value as of the last business day of the prior quarter. Fees for accounts opened at any time other than the beginning of a quarter, fees will be prorated based on the number of days remaining in the initial quarter.

RJA is responsible for debiting all fees from client accounts. In this Program you must provide RJA written authorization to debit advisory fees from your account(s) and pay such fees to HFS. The custodian sends a quarterly statement to you which shows all amounts disbursed from your account, including fees paid to us. You understand your brokerage statement will show the amount of the asset-based fee, the value of the assets on which the fee was based, and the days used to calculate fees.

The ICA Platform Managed Account may cost you more or less than if the assets were held in a traditional brokerage account. In a brokerage account, you are charged commissions for each transaction, and the representative has no duty to provide ongoing advice with respect to the account. If you plan to follow a buy and hold investment strategy for the account or do not wish to purchase ongoing investment advice or management services, you should consider opening a brokerage account rather than an ICA Platform Managed account.

### **Compensation**

Advisory Representatives are typically compensated based on their annual gross revenue generated, whereby higher gross revenue will generally result in higher payouts. The Firm generally pays its Advisory Representatives under a payout grid or flat fee formula. Some Advisory Representatives receive a base salary and discretionary bonus from an affiliate dependent

upon their employment status.

As a result, an Advisory Representative's payout is not dependent (or variable) upon the type of transaction entered into with, or product/service provided to, any client. Although the payout is uniform for a Advisory Representative regardless of the transaction type or account program utilized, clients should understand that asset-based fees vary amongst the different account programs offered by the Firm. As a result, the Advisory Representative's gross fee compensation is generally higher when the account program fee is higher. In addition, clients should understand that the payout differs amongst Advisory Representatives.

As disclosed in this section, HFS receives compensation as a result of your participation in the Program. HFS therefore has a financial incentive to recommend the Program over other programs or services. The amount of HFS' compensation may be more or less than what you would pay if you participated in programs sponsored by other financial firms or paid separately for investment advice, brokerage, and other services.

### **Additional Fees and Expenses**

Our fees are exclusive of non-HFS brokerage commissions, transaction fees, and other related costs and expenses which you may be charged such as IRA custodial fees, safekeeping fees, interest charges on margin loans, and fees for legal or courtesy transfers of securities. A list of RJA's other account service charges can be viewed online at

<https://www.raymondjames.com/wealth-management/why-a-raymond-james-advisor/client-resources/client-account-fees-and-charges> or obtained from your Advisory Representative.

As part of our investment advisory services to you, we may invest, or recommend that you invest, in mutual funds and exchange traded funds. The fees that you pay to our firm for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds or exchange traded funds (described in each fund's prospectus) to their shareholders. Certain open-end mutual funds that may be acquired by clients, may, in addition to assessing management fees, internally assess a distribution fee pursuant to section 12(b)-1 of the Investment Company Act of 1940, or an administrative or service fee ("trail"). Trails are included in the calculation of the annual operating expenses of a mutual fund and are disclosed in the fund prospectus. If 12b-1 fees are received on ICA Platform accounts, RJA will retain all fees and HFS or its Advisory Representatives do not share or receive such fees.

### **Additional Compensation, Economic and Non-Economic Benefits**

While there will not be a direct linkage between the investment advice provided by HFS and the economic benefits from the custodian that may be received that would not be received if HFS did not use these services to implement the investment advice provided. These benefits include, but not necessarily be limited to: access to a trading desk, as well as sales, training, marketing, research and tech support; access to RJA sponsored advisory platform programs, access to electronic trade supervision and CRM technology, the ability to have investment advisory fees deducted directly from client accounts; access to an electronic communications network for client order entry and account information; and access to mutual funds that generally require significantly higher minimum initial investments or are generally only available to institutional investors. (See "RJA as Custodian" in Item 9 of this brochure for more details)

The Advisory Representatives of HFS who are registered representatives or insurance representatives may be eligible to receive various incentives that may be based upon production levels. These incentives may include marketing reimbursements, educational conference trips or discounts on various software or investment-related research materials. HFS may also be provided with various newsletters or publications from financial services firms as a customary consideration.

### **Aggregate Trades**

In some instances, trades for more than one client's account may be aggregated ("block trades") and executed as a single trade in order to provide fair and equitable prices among managed client accounts. All clients will receive equal treatment when HFS and its Advisory Representatives perform block trades for managed accounts. Securities purchased or sold using block trades will then be allocated in a fair and equitable manner to all client accounts involved in the block trade. If for any reason the entire block trade cannot be completed on the day the trade is placed, HFS will keep records of all block trades

executed and the allocations for each client account that participates in the block trade. HFS and its Advisory Representatives will not receive additional compensation as a result of block trading.

### **Trade Error Policy**

Based on industry practice and SEC guidance to broker-dealers, a trade error under this policy is defined as including:

- Inaccurate transmission or execution of any term of an order including, but not limited to: price; number of shares or other unit of trading; identification of the security; identification of the account for which securities are purchased or sold; short sales that were instead sold long or vice versa; or the execution of an order on the wrong side of a market;
- Unauthorized (because of misunderstanding or mistake) or unintended purchase, sale or allocation of securities, or the failure to follow specific client instructions; and
- Incorrect entry of data into relevant systems, including reliance on incorrect cash positions, withdrawals or securities positions reflected in an account.

HFS has implemented procedures designed to prevent trade errors; however, trade errors in client accounts cannot always be avoided. Consistent with its fiduciary duty, it is the policy of HFS to correct trade errors in a manner that is in the best interest of the client. In cases where the client causes the trade error, the client will be responsible for any loss resulting from the correction. Depending on the specific circumstances of the trade error, the client may not be able to receive any gains generated as a result of the error correction which would then be retained by RJ. In all situations where the client does not cause the trade error, the client will be made whole and any loss resulting from the trade error will be absorbed by HFS if the error was caused by the Firm. HFS will never benefit or profit from advisory account trade errors.

## **Item 5 – Account Requirements and Types of Clients**

The Platform requires a minimum asset value for a program account to be managed. The minimums vary depending on the portfolio(s) selected and the account's allocation amongst portfolios. The lowest minimum for a portfolio is \$25,000. In certain instances, a lower minimum for a portfolio is permitted. Where the total value of cash and securities in a fee-based advisory account falls below the minimum initial investment requirement, the firm reserves the right to terminate the client's advisory account participation if HFS, in its discretion, determines that the account cannot be economically or effectively managed due to the small account size.

We offer investment advisory services to generally provides investment advisory services to individuals, corporate pension and profit -sharing plans, trusts, estates, charitable organizations, foundations, endowments, corporations and other business entities. The majority of our clients are retail clients that are not high-net-worth individuals.

### **Opening an Account**

To become a Program participant, a program agreement (the *ICA Platform Managed Account Client Agreement*) and Investor Profile Questionnaire between the client and HFS must be executed.

In addition, the client will be required to establish a brokerage account through the ICA platform custodied at RJ.

### **Termination of Services**

Program services may be canceled at any time, by any of the parties, for any reason upon receipt of written notice to the other party. Services will be terminated without penalty and the client shall receive a pro-rated refund based on the amount of time remaining in the final quarter. Specific termination provisions are contained in the ICA Platform Managed Account Client Agreement.

After the Program agreement has been terminated, transactions are processed at the prevailing brokerage rates/fees. You become responsible for monitoring your own assets and our firm has no further obligation to act upon or to provide advice with respect to those assets.



## Item 6 – Portfolio Manager Selection and Evaluation

The Program does not allow Advisory Representatives or clients to utilize portfolio managers that are not associated with HFS. In other words, the only portfolio managers selected for managing client assets in the Program are Advisory Representatives or affiliate sub-advisors. Therefore, conflicts of interest present in other wrap-fee programs that make available unaffiliated portfolio managers are not present in this Program. Because the Program does not provide for a multitude of outside portfolio managers, HFS does not have procedures designed to select outside portfolio managers. Most of the items required by this item of the Wrap Fee Program Brochure instructions do not apply to HFS. Items that do apply are answered below.

### **Methods of Analysis, Investment Strategies and Risk of Loss**

HFS' Advisory Representatives use various methods of analysis and investment strategies. Methods and strategies will vary based on the HFS Advisory Representative providing advice. Models and strategies used by one Advisory Representative may be different than strategies used by other Advisory Representatives. Some HFS Advisory Representatives may use just one method or strategy while other Advisory Representatives may rely on multiple. HFS does not require or mandate a particular investment strategy be implemented by its Advisory Representatives. Further, HFS has no requirements for using a particular analysis method and HFS Advisory Representatives are provided flexibility (subject to HFS supervision and compliance requirements) when developing their investment strategies.

Although HFS' Advisory Representatives have the ability to develop and implement their own investment strategies and methods of analysis, Advisory Representatives may elect to have their accounts managed in accordance with the strategies and methods of analysis developed by a sub-advisor. In these situations, the sub-advisor will be responsible for actively determining investment recommendations and implementing such recommendations. Numerous model portfolios are developed by sub-advisors at any one time, but generally speaking, portfolios will be designed based on the following objectives:

- Income with Capital Preservation,
- Income with Moderate Growth,
- Growth with Income,
- Growth, and
- Aggressive Growth

Advisory Representatives may use one or more of the following methods of analysis or investment strategies when providing investment advice to you:

**Charting** - The set of techniques used in technical analysis in which charts are used to plot price movements, volume, settlement prices, open interest, and other indicators, in order to anticipate future price movements. Users of these techniques, called chartists, believe that past trends in these indicators can be used to extrapolate future trends.

**Cyclical** - Analyzes the investments sensitive to business cycles and whose performance is strongly tied to the overall economy. For example, cyclical companies tend to make products or provide services that are in lower demand during downturns in the economy and higher demand during upswings. Examples include the automobile, steel, and housing industries. The stock price of a cyclical company will often rise just before an economic upturn begins, and fall just before a downturn begins. Investors in cyclical stocks try to make the largest gains by buying the stock at the bottom of a business cycle, just before a turnaround begins.

**Fundamental** - A method of evaluating a security by attempting to measure its intrinsic value by examining related economic, financial and other qualitative and quantitative factors. Fundamental analysts

attempt to study everything that can affect the security's value, including macroeconomic factors (like the overall economy and industry conditions) and individually specific factors (like the financial condition and management of companies). The end goal of performing fundamental analysis is to produce a value that an investor can compare with the security's current price in hopes of figuring out what sort of position to take with that security (underpriced = buy, overpriced = sell or short). This method of security analysis is considered to be the opposite of technical analysis. Fundamental analysis is about using real data to evaluate a security's value. Although most analysts use fundamental analysis to value stocks, this method of valuation can be used for just about any type of security.

**Technical** - A method of evaluating securities by analyzing statistics generated by market activity, such as past prices and volume. Technical analysts do not attempt to measure a security's intrinsic value, but instead use charts and other tools to identify patterns that can suggest future activity. Technical analysts believe that the historical performance of stocks and markets are indications of future performance.

### **Risk of Loss**

Past performance is not indicative of future results. Therefore, current and prospective clients (including you) should never assume that future performance of any specific investment or investment strategy will be profitable. Investing in securities (including stocks, mutual funds, and bonds) involves risk of loss. Further, depending on the different types of investments there may be varying degrees of risk. Clients and prospective clients should be prepared to bear investment loss including loss of original principal.

Because of the inherent risk of loss associated with investing, our Firm is unable to represent, guarantee, or even imply that our services and methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to market corrections or declines. There are certain additional risks associated when investing in securities through our investment management program. The following are some additional risks clients need to be aware of.

- **ETF and Mutual Fund Risk** – When HFS invests in an ETF or mutual fund for a client, the client will bear additional expenses based on its pro rata share of the ETF's or mutual fund's operating expenses, including the potential duplication of management fees. The risk of owning an ETF or mutual fund generally reflects the risks of owning the underlying securities the ETF or mutual fund holds. Clients may also incur brokerage costs when purchasing ETFs.
- **Market Risk** – Either the stock market as a whole, or the value of an individual company, goes down resulting in a decrease in the value of client investments. This is also referred to as systemic risk.
- **Equity (stock) market risk** – Common stocks are susceptible to general stock market fluctuations and to volatile increases and decreases in value as market confidence in and perceptions of their issuers change. If you held common stock, or common stock equivalents, of any given issuer, you would generally be exposed to greater risk than if you held preferred stocks and debt obligations of the issuer.
- **Company Risk**. When investing in stock positions, there is always a certain level of company or industry specific risk that is inherent in each investment. This is also referred to as unsystematic risk and can be reduced through appropriate diversification. There is the risk that the company will perform poorly or have its value reduced based on factors specific to the company or its industry. For example, if a company's employees go on strike or the company receives unfavorable media attention for its actions, the value of the company may be reduced.

- Fixed Income Risk. When investing in bonds, there is the risk that issuer will default on the bond and be unable to make payments. Further, individuals who depend on set amounts of periodically paid income face the risk that inflation will erode their spending power. Fixed-income investors receive set, regular payments that face the same inflation risk.
- Options Risk. Options on securities may be subject to greater fluctuations in value than an investment in the underlying securities. Purchasing and writing put and call options are highly specialized activities and entail greater than ordinary investment risks.
- Inflation Risk: When any type of inflation is present a dollar next year will not buy as much as a dollar today, because purchasing power is eroding at the rate of inflation.
- Currency Risk: Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- Reinvestment Risk: This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (interest rate). This primarily relates to fixed income securities.
- Business Risk: These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk to profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- Liquidity Risk: Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, U.S. Treasury securities are highly liquid, while real estate properties are not.
- Financial Risk: Excessive borrowing to finance a business' operations increases the risk of profit loss, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.
- Correlation Risk: This is the risk that the actual correlation (a statistical measure of how two or more variables move in relation to each other) between two assets (or variables) will be different than the correlation that was assumed or expected. Differences between the actual and expected correlation may result in a portfolio being riskier than was anticipated.
- Management Risk – Your investment with our Firm varies with the success and failure of our investment strategies, research, analysis and determination of portfolio securities. If our investment strategies do not produce the expected returns, the value of the investment may decrease.
- Counterparty/Default Risk: This is the risk that a party to a contract will not live up to (or default on) its contractual obligations to the other party to the contract.
- Valuation Risk: This is the risk that an asset is improperly valued in relation to what would be received upon its being sold or redeemed at maturity.
- Tax Risk: This is the risk that tax laws may change and impact the underlying investment premise or profitability of an investment.
- Cybersecurity Risk: Intentional cybersecurity breaches include unauthorized access to systems, networks, or devices (such as through "hacking" activity); infection from computer viruses or other malicious software code; and attacks that shut down, disable, slow, or otherwise disrupt operations, business processes, or website access or functionality. In addition, unintentional incidents can occur, such as the inadvertent release

of confidential information (possibly resulting in the violation of applicable privacy laws). A cybersecurity breach could result in the loss or theft of customer data, the inability to access electronic systems ("denial of services"), loss or theft of proprietary information or corporate data, physical damage to a computer or network system, or costs associated with system repairs. Such incidents could cause an investment fund, the advisor, a manager, or other service providers to incur regulatory penalties, reputational damage, additional compliance costs, or financial loss.

- **Technology Risk** – HFS must rely in part on digital and network technologies to conduct its business. These technologies include those owned or managed by HFS as well as those owned or managed by others, such as RJA and other financial intermediaries used by HFS to provide services and maintain its business operations. These technology systems may fail to operate properly or become disabled as a result of events or circumstances wholly or partly beyond HFS's or its service providers' control. Technology failures, whether deliberate or not, including those arising from use of third-party service providers or client usage of systems to access accounts, could have a material adverse effect on our business or our clients and could result in among other things, financial loss, reputational damage, regulatory penalties or the inability to conduct business.

### **Tax Considerations**

Our strategies and investments may have unique and significant tax implications. However, unless we specifically agree otherwise, and in writing, tax efficiency is not our primary consideration in the management of your assets. Regardless of your account size or any other factors, we strongly recommend that you continuously consult with a tax professional prior to and throughout the investing of your assets.

As a result of revised IRS regulations, custodians and broker-dealers will begin reporting the cost basis of equities acquired in client accounts on or after January 1, 2011. RJA uses the first in, first out (FIFO) accounting method as the default method for calculating the cost basis of your investments. Please discuss with your Advisory Representative to determine the default method to be used for your accounts. You are responsible for contacting your tax advisor to determine if this accounting method is the right choice for you. If your tax advisor believes another accounting method is more advantageous, please provide written notice to our firm immediately and we will alert your account custodian of your individually selected accounting method. Please note that decisions about cost basis accounting methods will need to be made before trades settle, as the cost basis method cannot be changed after settlement.

### **Proxy Voting**

HFS will not vote proxies on behalf of your account. While there are some investment advisers that will vote proxies and other corporate decisions on behalf of their clients, we have determined that taking on the responsibility for voting client securities does not add enough value to the services provided to clients to justify the additional compliance and regulatory costs associated with voting client securities. Therefore, it is your responsibility to vote all proxies for securities held in accounts managed by our Firm.

Clients will receive proxies directly from their custodian or transfer agent and such documents will not be delivered by our Firm. In some instances, and at your specific request, your Advisory Representative may give recommendations or clarifications based on your Advisory Representative's understanding of the issues presented in the proxy materials. Your Advisory Representative may also conduct additional research on proxy issues if necessary; however, you will be solely responsible for all proxy voting decisions.

### **General Description of Primary Advisory Services**

Detailed descriptions of HFS' services other than the Program are provided in our Disclosure Brochure, and include:

**Financial Planning Services** – HFS provides advisory services in the form of financial planning services. Financial planning services do not involve the active management of client accounts, but instead focuses on a client's overall financial situation. Financial planning can be described as helping individuals determine and set their long-term

financial goals, through investments, tax planning, asset allocation, risk management, retirement planning, and other areas. The role of a financial planner is to find ways to help the client understand his/her overall financial situation and help the client set financial objectives.

**Asset Management Services** – HFS provides advisory services in the form of Asset Management Services through the Program and other advisory programs and platforms sponsored by RJA. Asset Management Services involve providing clients with continuous and on-going supervision over client accounts. This means that HFS will continuously monitor a client's account and make trades in client accounts when necessary.

**Outside Money Managers** – HFS provides advisory services by referring clients to outside, or unaffiliated, money managers that are registered or exempt from registration as investment advisers. Third-party money managers are responsible for continuously monitoring client accounts and making trades in client accounts when necessary.

### **Performance-Based Fees and Side-By-Side Management**

HFS does not charge or accept performance-based fees. Regulators have defined performance-based fees as charging fees based on a share of capital gains on or capital appreciation of the assets held within a client's account.

### **Client Assets Managed by Harbor Financial Services, LLC**

The amount of client assets managed by HFS totaled approximately \$620,884,799 as of December 31, 2020. \$324,743,962 is managed on a discretionary basis and \$296,140,837 is managed on a non-discretionary basis.

## **Item 7- Client Information Provided to Portfolio Managers**

Because only Advisory Representatives of HFS or affiliate sub-advisors serve as portfolio managers, Advisory Representatives or their assistants are responsible for gathering all information provided by clients. Advisory Representatives will interview and work with clients to gather all information needed relative to their investment objectives and needs in order to provide management services through the Program. Clients need to contact their Advisory Representative whenever there are changes to their financial situation that will impact or materially influence the way accounts are managed.

## **Item 8 – Client Contact with Portfolio Managers**

It is the policy of HFS to provide an "open channel" of communication between Advisory Representatives and their clients. You are encouraged to contact your Advisory Representative whenever you have questions about the management of your account, or have changes to your investment objectives, risk tolerance, or requested restrictions placed on the management of your Program assets.

## **Item 9 – Additional Information**

### **Account Reviews**

Account reviews are provided in connection with the Program. For clients participating in the Program, your individual Advisory Representative will contact you at least annually for the purpose of reviewing your account and to determine if there have been changes in their financial situation or investment objectives. The calendar is the main triggering factor, although more frequent reviews may also be triggered by changes in your circumstances, your request, or changes within the market.

### **Statements and Reports**

During any month that there is activity in the Program account, the client receives a monthly account statement, from RJA, showing account activity as well as positions held in the account at month end. Additionally, the client receives a

confirmation of each transaction that occurs within the Program account unless the transaction is the result of a systematic purchase, redemption or exchange. The client will also receive a detailed quarterly report showing performance, positions, and activity. All account data and statements are also available on-line through the account view portal through RJA.

Clients are strongly urged to compare all reports prepared by HFS against the account statements received from RJA.

### **Disciplinary Information**

Below is a summary of the material legal and disciplinary events against HFS during the last ten years. As of the date of this brochure, there are no such reportable events for our senior management and those supervisory individuals responsible for oversight of the general investment advice provided to our clients.

Our firm operates as both a broker-dealer and as an investment adviser. The disciplinary reporting requirements for broker-dealers and investment advisers differ in some ways, with FINRA requiring broker-dealers to report on matters (for example, pending complaints and arbitrations) which are not required to be reported by investment advisers. The information in this report is not the only resource you can consult. You can access additional information about our firm and our management personnel on the SEC's website, located at <http://www.adviserinfo.sec.gov>, as well as FINRA's website, at <https://brokercheck.finra.org/>.

HFS is subject to the regulatory oversight of the SEC, FINRA, the Department of Labor and other federal and state regulatory agencies. No regulatory enforcement actions have been brought against HFS by any of the aforementioned regulatory authorities concerning the firm's or its management's provision of advisory services.

Please note that in each instance described below, the firm entered into the various orders, consents and settlements without admitting or denying any of the allegations.

#### **FINRA Letter of Acceptance Waiver, and Consent**

During March 2012, we submitted a Letter of Acceptance, Waiver and Consent ("AWC") to Financial Industry Regulatory Authority ("FINRA") to settle allegations of rule violations. HFS failed to establish and maintain a supervisory system reasonably designed to achieve compliance with NASD Conduct Rule 2440 (Fair Prices and Commissions), resulting in customers being charged unfair and unreasonable commissions on equity transactions, in violation of NASD Conduct Rules 2440, 3010 and 2110, FINRA Rule 2010 and NASD IM-2440- 1.

HFS accepted and consented, without admitting or denying the findings, and solely for the purposes of the proceeding brought by FINRA. As a result, HFS had to pay a \$5,000 fine and restitution of \$19,152.70 plus interest.

### **Other Financial Industry Activities and Affiliations**

HFS is not and does not have a related company that is a (1) investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and offshore fund), (2) futures commission merchant, commodity pool operator, or commodity trading advisor, (3) banking or thrift institution, (4) pension consultant, (5) real estate broker or dealer, (6) sponsor or syndicator of limited partnerships, or (7) law firm.

HFS' business is primarily providing brokerage and advisory services to clients. HFS is also a municipal securities broker-dealer. In addition, many of HFS' Advisory Representatives are engaged in professions other than giving investment advice. Those that are registered representatives of HFS's broker-dealer, or are licensed insurance agents, may sell securities or insurance products to any client, and will receive usual and customary commissions for these transactions.

### **Harbor Financial Services, LLC as Broker/Dealer**

HFS Advisory Representatives may also be licensed to sell securities in a capacity as Registered Representatives or registered principals with HFS. Some HFS Advisory Representatives may not be registered with the Firm's broker/dealer. For those that



are, such HFS Advisory Representatives, acting in their separate capacities as Registered Representatives or registered principals of HFS, may sell, for commissions, general securities products such as stocks, bonds, mutual funds, exchange-traded funds, and variable annuity and variable life products to advisory clients.

HFS does not require its Adviser Representatives to encourage clients to implement investment advice through the Firm's broker/dealer. Clients of HFS are free to implement investment advice through any broker/dealer or product sponsor they may select. However, clients should understand that, due to certain regulatory constraints, HFS Advisory Representatives, in the capacity as a dually Registered Representative, must place all purchases and sales of securities products in commission-based brokerage accounts through HFS as broker/dealer or other HFS approved institutions.

### **Accounting Services**

Some of HFS' Advisory Representatives may establish relationships with CPA firms not related to HFS and may provide advisory services to clients of these accounting firms. Some Advisory Representatives may be separately licensed as Certified Public Accountants or Enrolled Agents with the Internal Revenue Service and provide accounting or tax preparation services to clients. If appropriate, advisory clients may be offered these accounting or tax preparation services, but they are not obligated to use these services. When a representative refers clients for these services, they or the Firm have a financial incentive to do so, which creates a conflict of interest. If clients do elect to use these services, charges for tax or accounting services provided will be separate from fees charged for advisory services.

### **Affiliated Entities**

HFS is affiliated with other investment advisers, Level Four Advisory Services, LLC ("LFAS"), an SEC registered investment adviser, Level Four Capital Management, LLC ("LFCM"), an SEC registered investment adviser and Preferred Legacy Trust, a state-regulated non-depository trust company. HFS, LFAS and LFCM have overlap in personnel and HFS may use LFCM as a sub-advisor for client accounts. HFS may have occasion to refer clients to Preferred Legacy Trust for trust services as may be appropriate given a client's stated needs and objectives; however, HFS and Preferred Legacy Trust do remain operationally independent entities.

### **Level Four Insurance Agency**

Level Four Group, LLC is the sole owner of Level Four Insurance Agency, a licensed insurance agency. Some of HFS' Advisory Representatives own Level Four Group, LLC and sell insurance products through Level Four Insurance Agency.

Some of HFS' Advisory Representatives are independently licensed insurance agents and may be affiliated with various insurance companies. When selling insurance products in this separate capacity, they may receive normal and customary commissions. Some of HFS' Advisory Representatives own Level Four Group, LLC and sell insurance products through Level Four Insurance Agency.

### **Carr, Riggs & Ingram, L.L.C.**

An HFS owner, Level Four Group, is indirectly 100% owned and controlled by Carr, Riggs, & Ingram, L.L.C. (CRI), an Alabama limited liability company and accounting firm. Although clients of HFS in need of accounting services will typically be referred to the client's individual Advisory Representative's related accounting firm, clients may also be referred to CRI. Because CRI is an indirect owner of HFS, we have a financial incentive to recommend CRI over other accounting firms. Moreover, CRI may refer their clients to HFS. As indirect owner of HFS, CRI has an economic incentive to recommend HFS over other financial firms offering similar services to those offered by HFS.

CRI is also the 100% indirect owner of Auditwerx, LLC, another accounting firm and CRI Transaction Advisors, LLC, a mergers and acquisitions advisory firm and registered broker/dealer. HFS does not have material arrangements with these firms and does not typically share or refer clients with either firm.

If you are referred to an affiliated company of HFS or referred by an affiliated company of HFS, please understand this

presents a conflict of interest. You are under no obligation to work with HFS or one of our affiliated companies. You can work with any accounting firm, investment advisor or other Advisory Representative of your choosing.

### **Miscellaneous**

#### **Financial Planning and Non-Investment Consulting/Implementation Services.**

To the extent requested by a client, HFS may provide consulting services regarding non-investment related matters, such as estate planning, tax planning, insurance, etc. HFS does not serve as an attorney, accountant, or insurance agent, and no portion of HFS's services should be construed as same. To the extent requested by a client, HFS may recommend the services of other professionals for certain non-investment implementation purposes (i.e. attorneys, accountants, insurance, etc.). The client is under no obligation to engage the services of any such recommended professional. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation from HFS and/or its representatives.

Please note, if the client engages any such recommended professional, and a dispute arises thereafter relative to such engagement, the client agrees to seek recourse exclusively from and against the engaged professional. Please Also Note-

#### **RJA as Custodian**

HFS receives support services and/or products from RJA, which assist HFS to better monitor and service Program accounts maintained at RJA. These support services and/or products may be received without cost and/or at a discount. Our receipt of these economic benefits raises potential conflicts of interest. In providing additional cash compensation, RJA most likely considers the amount and profitability to RJA of the assets in, and trades placed for, our client accounts maintained in those RJA programs or products. In order to continue to receive the additional compensation from RJA, we therefore have an incentive to recommend RJA programs or products. RJA provides the Firm with cash and non-cash economic benefits such as:

- Advisory and brokerage account related fee sharing for transition assistance on account transfers as well as Security Based Loan (SBLs) fee income. Our Advisory Representatives receive no part of this additional compensation.
- Brokerage account related fee sharing includes margin and cash balance interest, as well as transaction handling fees. Our Advisory Representatives receive no part of this additional compensation.
- Fee sharing limited to RJ sponsored advisory account administrative fees. Our Advisory Representatives receive no part of this additional compensation.
- Cash and non-cash sponsorship assistance with the Firm's annual conference/educational meeting. Our Advisory Representatives attend the conferences.
- Training and Onboarding support. Our Advisory Representatives have access.
- Marketing support. Our Advisory Representatives have access.
- Practice management support. Our Advisory Representatives have access.
- Client management support. Our Advisory Representatives have access.
- Succession planning support. Our Advisory Representatives have access.
- The Firm and Advisory Representatives pay a monthly technology fee to RJA, but could be receiving additional benefit beyond what we pay for services such as:
- Research. Our Advisory Representatives have access.
- Technology for the Firm (Compliance systems, CRM, Client Reporting, Hardware/software support, Mobile access app). Our Advisory Representatives have access.
- Technology for our Clients (Online Client access, File sharing, Security reimbursement policy, Mobile access app)

These arrangements do not cause our clients to pay any additional transaction fees beyond those that are traditionally charged by our firm and/or other service providers and our receipt of such compensation does not diminish our duty to act in your best interests, including to seek best execution of trades for your accounts.



## **Code of Ethics Summary**

According to the Investment Advisers Act of 1940, an investment adviser is considered a fiduciary. As a fiduciary, it is an investment adviser's responsibility to provide fair and full disclosure of all material facts. In addition, an investment adviser has a duty of utmost good faith to act solely in the best interest of each of its clients. HFS and its Advisory Representatives have a fiduciary duty to all clients. HFS has established a Code of Ethics which all Advisory Representatives must adhere to. They must execute an annual acknowledgment agreeing that they understand and agree to comply with that Code of Ethics.

The fiduciary duty of HFS and its Advisory Representatives to clients is considered the core underlying principle for HFS' Code of Ethics and represents the expected basis for all dealings the Advisory Representatives have with clients. HFS has the responsibility to make sure that the interests of clients are placed ahead of it or its Advisory Representatives' own investment interests. All Advisory Representatives will conduct business in an honest, ethical and fair manner. All Advisory Representatives will comply with all federal and state securities laws at all times. Full disclosure of all material facts and potential conflicts of interest will be provided to clients prior to services being conducted. All Advisory Representatives have a responsibility to avoid circumstances that might negatively affect or appear to affect the Advisory Representatives' duty of complete loyalty to their clients.

This section is only intended to provide current clients and potential clients with a description of HFS' Code of Ethics. If current clients or potential clients wish to review HFS' Code of Ethics in its entirety, a copy may be requested from any of HFS' Advisory Representatives and a copy will be promptly provided.

## **Affiliate and Employee Personal Securities Transactions Disclosure**

HFS, our Advisory Representatives and/or our personnel may buy or sell securities in their personal accounts that we may also recommend to clients. Because this policy may create a conflict between the interests of clients and the personal investing opportunities of our personnel, we have established several procedures to control for the apparent conflict of interest.

- HFS is and shall continue to be in compliance with *The Insider Trading and Securities Fraud Enforcement Act of 1988*. Personnel shall not buy or sell securities for their personal account(s) where their decision is derived, in whole or in part, from information obtained as a result of his/her employment unless the information is also available to the investing public upon reasonable inquiry.
- It is our policy that no Advisory Representative shall prefer his or her own interest to that of the advisory client.
- Our personnel may not purchase or sell any security traded over an exchange (such as a stock position) prior to transactions in the same securities are implemented for an advisory client account.
- Most investments owned by our personnel are publicly traded and widely available (such as mutual funds).

## **Client Referrals and Other Compensation**

### **Client Referrals**

HFS and its Advisory Representatives may enter into arrangements with unaffiliated investment advisory firms and unaffiliated individuals ("Solicitors") who will refer clients that may be candidates for investment advisory services to HFS.

In return, HFS will agree to compensate the Solicitor for the referral. Compensation to the Solicitor is dependent on the client entering into an advisory agreement with HFS. Compensation to the Solicitor will be an agreed upon percentage of HFS' investment advisory fee or a flat fee depending on the type of advisory services HFS provides to the referred client. HFS' referral program will be in compliance with federal or state regulations (as applicable). The solicitation/referral fee is paid pursuant to a written agreement retained by both HFS and the Solicitor. The Solicitor will be required to provide the client with a copy of the HFS Form ADV Part 2A and a Solicitor Disclosure Document at the time of solicitation. The Solicitor is not permitted to offer clients any investment advice on behalf of HFS. The advisory fee charged to clients will not increase as a result of compensation being shared with the Solicitor.

## **Financial Information**

This item is not applicable to this brochure. HFS does not require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance. Therefore, we are not required to include a balance sheet for our most recent fiscal year. HFS is not subject to a financial condition that is reasonably likely to impair our ability to meet contractual commitments to clients. Finally, HFS has not been the subject of a bankruptcy petition at any time.

## **BUSINESS CONTINUITY**

HFS has adopted a Business Continuity Plan ("BCP" that provides for the continuation of business- critical functions in the even its headquarters becomes partially or totally inaccessible, or a technical problem occurs. The recovery strategies HFS employs are designed to limit the impact on clients from such business interruptions or disasters. Although HFS has taken reasonable steps to develop and implement a business continuity plan, unforeseen circumstances may create situations where HFS is unable to fully recover from a significant business interruption. However, HFS believes its planning and implementation process reduces the risk in this area.

The firm's BCP Disclosure statement is available upon request through your Advisory Representative, or may be reviewed on our public website: <http://www.harborfs.com/disclosures.html>.

## **YOUR PRIVACY**

We view protecting your private information as a top priority. Pursuant to applicable privacy requirements, we have instituted policies and procedures to ensure that we keep your personal information private and secure.

We do not disclose any non-public personal information about you to any non-affiliated third parties, except as permitted by law. In the course of servicing your account, we may share some information with our service providers, such as transfer agents, custodians, broker-dealers, accountants, consultants, and attorneys.

Your agreement with SMA Managers defines our ability to communicate your personal information collected by your Advisor Representative at the time the account is opened to generally include: name, social security/tax identification number, address, phone number, employer, occupation, date of birth, number of dependents, net worth, annual income, investment experience, retirement status, investment objective, risk tolerance and timer horizon. You are requested on an annual basis to update this information, which, if applicable, is promptly forwarded to your discretionary SMA Manager (where applicable).

We restrict internal access to non-public personal information about you to employees, who need that information in order to provide products or services to you. We maintain physical and procedural safeguards that comply with regulatory standards to guard your non-public personal information and to ensure our integrity and confidentiality. We will never sell information about you or your accounts to anyone.



11 N. Water Street Ste 21290  
Mobile, AL 36602  
(251) 650-0840  
Fax (251) 281-2007

FACTS	WHAT DOES HARBOR FINANCIAL SERVICES, LLC DO WITH YOUR PERSONAL INFORMATION?
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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.
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What?	<p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> <li>▪ Social Security number and investment experience</li> <li>▪ Assets and income</li> <li>▪ Account balances and account transactions</li> <li>▪ When you are no longer our customer, we continue to share your information as described in this notice.</li> </ul>
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How?	All financial companies need to share customer's personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customer's personal information; the reasons Harbor Financial Services chooses to share; and whether you can limit this sharing.
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Reasons we can share your personal information	Does Harbor Financial Services share?	Can you limit this sharing?
<b>For our everyday business purposes—</b> such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
<b>For our compliance with rules and regulations—</b> information about your transactions and communications provided to non-affiliated brokerage or investment advisory firms when required to comply with supervisory rules and regulations of HFS independent advisors	Yes	No
<b>For our marketing purposes—</b> to offer our products and services to you	Yes	No
<b>For joint marketing with other financial companies</b>	Yes	No

<b>For our affiliates' everyday business purposes—</b> information about your transactions and experiences	Yes	No
<b>For our affiliates' everyday business purposes—</b> information about your creditworthiness	No	We don't share
<b>For our affiliates to market to you</b>	No	We don't share
<b>For nonaffiliates to market to you</b>	No	We don't share

Who we are	
<b>Who is providing this notice?</b>	Harbor Financial Services, LLC

What we do	
<b>How does Harbor Financial Services protect my information?</b>	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.
<b>How does Harbor Financial collect my personal information?</b>	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> <li>▪ Open an account or perform transactions</li> <li>▪ Make a wire transfer or tell us where to send money</li> <li>▪ Tell us about your investment or retirement portfolio</li> </ul> <p>We also collect personal information from others such as credit bureaus, affiliates and other companies</p>
<b>Why can't I limit all sharing?</b>	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> <li>▪ Sharing for affiliates' everyday business purposes—information about your creditworthiness</li> <li>▪ Affiliates from using your information to market to you</li> <li>▪ Sharing for nonaffiliates to market to you</li> </ul> <p>State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.</p>

<b>How do I limit sharing?</b>	<ul style="list-style-type: none"> <li>▪ Call 888-397-7358 - our menu will prompt you through your choice(s) or</li> <li>▪ Visit us online: <a href="http://www.harborfs.com">www.harborfs.com</a></li> </ul> <p>Please note: If you are a new customer, we can begin sharing your information from the date we sent this notice. When you are no longer our customer, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing</p>
<b>What happens when I limit sharing for an account I hold jointly with someone else?</b>	Your choices will apply to everyone on your account.

<b>Definitions</b>	
<b>Affiliates</b>	<p>Companies related by common ownership, control, or directly involved in execution and settlement of client transactions. They can be financial and non-financial companies.</p> <p><i>Our clearing firm, Raymond James &amp; Associates is directly involved in execution and settlement of client transactions.</i></p>
<b>Nonaffiliates</b>	<p>Companies not related by common ownership, control, or directly involved in execution and settlement of client transactions. They can be financial and non-financial companies.</p> <ul style="list-style-type: none"> <li>▪ <i>Non-affiliates we may share information with include your independent Advisory Representative's brokerage or investment advisory firm.</i></li> </ul>
<b>Joint Marketing</b>	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> <li>▪ <i>Our joint marketing partners may include banks and credit unions</i></li> </ul>

## Other important information

Advisory Representatives ("FA") may change brokerage and/or investment advisor firms and nonpublic personal information collected by us and your FA may be provided to the new firm so your FA can continue to service your account(s). If you do not want your FA to provide this information to the new firm, please call 888-397-7358 to opt out of this sharing. Opt in states, such as California and Vermont and others, require your affirmative consent before the advisor can provide your nonpublic information to the new firm. You can provide or withdraw this consent at any time by contacting 888-397-7358. If your financial advisor is also affiliated with a bank, credit union, or other financial institution, and that financial institution enters into a relationship with a new financial services provider, we may share your information with the new financial services provider so your advisor can continue to service your account(s).

**Vermont:** In accordance with Vermont law, we will not disclose information about your creditworthiness to our affiliates and will not disclose your personal information, financial information, credit report, or health information to nonaffiliated third parties to market to you, other than as permitted by Vermont law, unless you authorize us to make those disclosures. Additional information concerning our privacy policies can be found at [harborfs.com](https://harborfs.com) or call 888-397-7358.

**California:** In accordance with California law, we will not share information we collect about you with companies outside of Harbor Financial, unless the law allows. For example, we may share information with your consent, to service your accounts, or to provide rewards or benefits you are entitled to. We will limit sharing among our companies to the extent required by California law. For additional information regarding your rights, please refer to the privacy notice (ccpa) for California residents at [harborfs.com](https://harborfs.com).

**Nevada:** In accordance with Nevada law, if you would like to be placed on our Internal Do Not Call List, please call **888-397-7358**. For more information, you may contact Harbor Financial Services, 11 North Water Street, Ste 21290, Mobile, AL 36602, or the Bureau of Consumer Protection, Office of the Nevada Attorney General, 555 E. Washington St., Suite 3900, Las Vegas, NV 89101. Phone number: 1.702.486.3132; email: [BCPINFO@ag.state.nv.us](mailto:BCPINFO@ag.state.nv.us).

**For Insurance Customers in AZ, CA, CT, GA, IL, ME, MA, MN, MT, NV, NJ, NC, OH, OR, and VA only.** The term "Information" in this section means customer information obtained in an insurance transaction. We may give your Information to state insurance officials, law enforcement, group policy holders about claims experience, or auditors as the law allows or requires. We may provide your Information to insurance support companies that may retain it or send it to others as needed to service your account. We may share your medical Information so we can learn if you qualify for coverage, process claims, or prevent fraud or if you provide authorization. To see your Information, write to Harbor Financial Services, 11 North Water Street, Ste 21290, Mobile, AL 36602, Attn: Data Request. You must state your full name, address, the insurance company, policy number (if relevant), and the Information you are requesting. We will inform you of what Information we have. You may see and copy the Information (unless privileged) at our office or ask that we mail a copy to you for a fee. If you think any Information is incorrect, you may submit a written request to have the Information corrected. We will notify you of what actions are taken. If you do not agree with our actions, you may send us a statement.