



WealthHarbor Capital Group, LLC

PRIVACY POLICY

WealthHarbor Capital Group, LLC ("WealthHarbor") recognizes that protecting the privacy and security of the confidential personal information we collect about you is an important responsibility. The following information will help you understand our privacy policy and how we will handle and maintain confidential personal information as we fulfill our obligations to protect your privacy. "Personal information" refers to the nonpublic financial information obtained by us in connection with providing you a financial service.

Why and How We Collect Personal Information

WealthHarbor collects nonpublic personal information about you to help us understand and serve your financial needs, provide customer service and fulfill legal and regulatory requirements. The type of information that we collect varies according to the products or services involved, and may include:

-) Information we receive from you on applications or other forms, via e-mail, or other written or oral communications (such as name, address, social security number, assets and income); and
-) Information about your transactions and relationships with us or others (such as products or services purchased, account balances and payment history);

How We Protect Your Personal Information

We will not disclose personal information about current or former customers to anyone, except as described in this policy or as permitted or required by law. We do not sell any personal information about you to any third party. In the normal course of business, personal information may be shared with persons or entities involved in servicing and administering products and services on our behalf.

WealthHarbor restricts access to your personal and account information to those employees who need to know that information to provide products and services to you. We educate our employees on the importance of protecting the privacy and security of confidential personal information. We also maintain physical, electronic and procedural safeguards that comply with federal regulations to guard your nonpublic personal information.

If a client is involved in a legal proceeding, both federal and state law provide parties to the litigation the right to compel the production of records and information from banks and other third party record keepers in certain situations. We will only disclose client information to third party litigants when we are required to do so by lawful judicial process or by court order.

How We Maintain Privacy on the Internet

WealthHarbor is firmly committed to maintaining our clients' privacy in the Internet world. If clients choose to contact us via e-mail, we will use e-mail information only for the specific purpose

WealthHarbor Capital Group Privacy Policy (continued)
of responding to requests or comments. E-mail addresses will not be sold, nor will they be shared with others outside of WealthHarbor, unless we are compelled to do so by law.

WealthHarbor's Web Site is available to the general public. Portions of the WealthHarbor Web Site ("Secure Areas") are restricted only to clients who have been assigned a log-in name and a password. These Secure Areas provide a private and secure Web environment to access account and other information. Our Web Site's Secure Areas use industry-standard security systems to protect clients' personal financial information. WealthHarbor's Web Site also does not have any online banner advertisements, nor do we allow other companies, called third-party ad servers or ad networks, to display advertisements on our Web Site.

We will update our policy and procedures where necessary to ensure that your privacy is maintained and that we conduct our business in a way that fulfills our commitment to you.

If you decide to close your account(s) or become an inactive customer, we will adhere to the privacy policies and practices as described in this notice.

We will deliver without charge, a copy of our brochure upon written request from a client. We will record the date the request was received and we will mail the brochure in response to a client request within seven days of receipt of the request.

WealthHarbor's accounts are carried by Pershing LLC, member NYSE/SIPC and 401(k) assets are carried by AdvisorTrust and MG Trust member FDIC.

If you have any questions about this Privacy Policy Pledge or have a question about the privacy of your information, please call us at (877) 444-9544.