

**FACTS****WHAT DOES Highland Consulting Associates, Inc. DO WITH YOUR PERSONAL INFORMATION?****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.

**What?**

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social security number and other personal information
- Account balances and transaction history
- Assets and Income

When you are *no longer* our customer, we continue to share your information as described in this notice.

**How?**

All financial companies need to share clients' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their clients' personal information; the reasons Highland Consulting chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Highland Consulting 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 marketing purposes</b> — to offer our products and services to you	Yes	No
<b>For joint marketing with other financial companies</b>	No	We don't share
<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

**Questions?**

Call 440-808-1500 or go to [www.highlandusa.net/privacy-notice-hca](http://www.highlandusa.net/privacy-notice-hca)

Who we are	
Who is providing this notice?	Highland Consulting Associates, Inc. (“Highland Consulting”)
What we do	
How does Highland protect my personal information?	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.
How does Highland collect my personal information?	We collect your personal information, for example, when you: <ul style="list-style-type: none"> <li>• Provide account information or give us your personal information</li> <li>• Seek investment advice or tell us about your accounts</li> <li>• Complete any client information documentation</li> </ul>
Why can't I limit all sharing?	Federal law gives you the right to limit only <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.</p>
Definitions	
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> <li>• Highland Consulting Associates International, Inc. is an affiliate of Highland Consulting Associates, Inc.</li> </ul>
Nonaffiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies.
Joint marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you.