

PRIVACY POLICY NOTICE

Howard Capital Management, Inc.

Privacy Policy Notice

In compliance with the Gramm-Leach-Bliley (GLBA) Act and the United States Securities and Exchange Commission (SEC), this notice describes the privacy policy and practices followed by Howard Capital Management, Inc. (HCM) and their affiliated companies. Your privacy is a high priority for us and it will be treated with the highest degree of confidentiality. In order for us to be able to provide you with products and services, we need to collect certain information from you. However, we want to emphasize that we are committed to maintaining the privacy of this information in accordance with law. All individuals with access to personal information about our customers are required to follow this policy.

Non-public Information Collected.

- Information we receive from you on applications or other forms such as your name, address, date and location of birth, marital status, sex, social security number, medical information, beneficiary information, etc., and
- Information about your transactions with us, our affiliates or others such as premium payment history, tax information, investment information, and accounting information.

Non-public Information Disclosed.

- We may provide the non-public information that we collect to affiliated or nonaffiliated persons or entities involved in the underwriting, processing, and servicing of your accounts with Howard Capital Management, Inc. We will not provide this information to any other nonaffiliated third party unless we have a written agreement that requires such third party to protect the confidentiality of this information.
- We may have to provide the above described non-public information that we collect to authorized persons or entities to comply with a subpoena or summons by federal, state or local authorities and to respond to judicial process or regulatory authorities having jurisdiction over our company for examination, compliance or other purposes as required by law.
- We do not disclose any non-public personal information about our customers to anyone except as permitted or required by law.
- We may disclose the information above between Howard Capital Management and Blue Duck Wealth Management as we are affiliated through common control and ownership.

Confidentiality and Security of Your Non-public Personal Information.

- We restrict access of non-public personal information about you to only those persons who need to know about the information to process and service your accounts with Howard Capital Management, Inc.
- We maintain physical, electronic, and procedural safeguards that comply with state and federal

standards to guard your non-public personal information.

- If we become aware at any time that personal information may be materially inaccurate, we will make a reasonable effort to re-verify its accuracy and correct any error as appropriate.

Information about Former Customers. Non-public information about our former customers is maintained by Howard Capital Management, Inc. on a confidential and secure basis. If any such disclosure is made, it would be for reasons and under the conditions described in this notice. We do not disclose any non-public personal information about our former customers to any except as permitted or required by law. Further Information and/or Customer Complaints. If you have any questions or comments, you can contact us at: 1145 Hembree Rd., Roswell, GA 30076, Phone: 770-642-4902 or Fax: 770-642-4906.