



April 2026

Privacy Notice

Financial companies choose how they share your personal information. Federal law gives our clients 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 our practices.

We do not disclose nonpublic personal information about our clients or former clients to third parties other than as described below.

Personal information we collect. We collect personal information about you in connection with our providing advisory services to you. This information includes your social security or tax identification number and may include other information such as your:

- Assets;
- Investment experience;
- Transaction history;
- Income; and
- Wire transfer instructions.

How we collect this information. We collect this information from you through various means. For example, when you give us your contact information, enter into an investment advisory contract with us, buy securities (i.e., interests in a fund) from us, tell us where to send money or make a wire transfer. We also may collect your personal information from other sources, such as our affiliates or other nonaffiliated companies¹.

How we use this information. All financial companies need to share clients' personal information to operate their day-to-day business. We use the personal information we collect from you for these routine business purposes, which may include:

- To provide advisory services to you;
- To open an account for you; and

¹ Our affiliates are companies related to us by common ownership or control and can include both financial and nonfinancial companies. Nonaffiliates are companies not related to us by common ownership or control and can include both financial and nonfinancial companies.

- To process a transaction for your account.

Disclosure to others. We may provide your personal information to our affiliates and to third parties that assist us in servicing your account and that have a need for such information, such as a broker or fund administrator. We may also share information with lawyers and accountants. We require third-party service providers to protect the confidentiality of your information and to use the information only for the purposes for which we disclose the information to them. We do not sell your personal information to, or share it with, nonaffiliated third parties for their own marketing purposes. Because we do not engage in these types of sharing, there is no opt-out right for you to exercise under Federal privacy law. In addition, we may disclose your personal information as required by applicable law, including, without limitation, in connection with a regulatory examination.

How we protect your personal information. To protect your personal information from unauthorized access and use, we use security measures that comply with Federal law. These measures include administrative, technical and physical safeguards, such as access controls, encryption, employee training, secured files and secured buildings. Access to your personal information is restricted to authorized personnel. We also maintain policies and procedures for the proper disposal of personal information. All safeguards apply to personal information of current, former and prospective clients.

Incident response and breach notification. We maintain a written incident response program designed to detect, respond to and recover from any unauthorized access to or use of your personal information. In the event of a security breach involving your sensitive personal information, we will notify you as soon as practicable, and in any event within the time required by applicable Federal and state law.

Your rights under state law. Depending on where you reside, you may have additional rights regarding your personal information under applicable state privacy laws.

Who is providing this Privacy Notice. This Privacy Notice relates to the following affiliated entities:

- Hirtle & Co., LLC
- HC Capital Partners, LLC
- HC Capital Trust

Whom to contact with questions. If you have any questions about this Privacy Notice, call 1-800-242-9596 or email compliancegroup@hirtle.com.