

# FACTS

## WHAT DOES HORTER INVESTMENT MANAGEMENT, LLC, (“HORTER”) 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 address
- Account balances and transaction history
- Assets, income, and similar personal, financial information

### How?

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

Reasons we can share your personal information	Does Horter 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	No	We don’t share
<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>	Yes	Yes
<b>For nonaffiliates to market to you</b>	No	We don’t share

### Who we are

#### Who is providing this notice?

Horter Investment Management, LLC

### Definitions

#### Affiliates

Companies related by common ownership or control. They can be financial and nonfinancial companies.

- *Our affiliates include Horter Financial Companies, LLC, Tactical Fund Advisors, LLC, Horter Financial Strategies, LLC, and Milestone Tax Center*

#### Nonaffiliates & Joint Marketing

Companies not related by common ownership or control. They can be financial and nonfinancial companies.

- *We do not share with nonaffiliates so they can market to you.*

#### Joint marketing

A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

- *We do not perform joint marketing efforts with nonaffiliated financial companies.*

## What we do

<b>How does Horter protect my personal information?</b>	<p>To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. Except as authorized by you in writing, we limit access to your information to those who need it to do their jobs or service your account.</p> <p>Horter has specifically implemented the following security measures to protect your personal data from being accidentally lost, used, or accessed in an unauthorized way, altered, or disclosed. These measures include:</p> <ul style="list-style-type: none"><li>• <b>Data Encryption:</b> Encrypting personal data to protect it from unauthorized access.</li><li>• <b>Access Controls:</b> Limiting access to personal data to authorized personnel only.</li><li>• <b>Regular Security Assessments:</b> Conducting regular security assessments to identify and mitigate potential vulnerabilities.</li></ul>
<b>How does Horter collect my personal information?</b>	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"><li>■ Give us your contact information</li><li>■ Open an account</li><li>■ Provide account information</li><li>■ Purchase products or services from us</li><li>■ Seek advice about your investments</li><li>■ As you interact with our website, we may collect technical data about your equipment, browsing patterns, etc. using cookies, server logs, and other similar technologies.</li></ul> <p>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.</p>
<b>What data does Horter collect?</b>	<p>We collect various types of personal data, including:</p> <ul style="list-style-type: none"><li>• <b>Identity Data:</b> First and last name.</li><li>• <b>Contact Data:</b> Email address, phone number, billing and delivery address</li><li>• <b>Technical Data:</b> IP address, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform.</li><li>• <b>Usage Data:</b> Information about how you use our website, products, and services.</li><li>• <b>Marketing and Communications Data:</b> Your preferences in receiving marketing from us and your communication preferences.</li></ul>
<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 information on your rights under state law.</p>
<b>How do we use your personal data?</b>	<p>We use your personal data for the following purposes:</p> <ul style="list-style-type: none"><li>• <b>SMS Program:</b> If you opt into our SMS program, we will send you messages regarding our services, updates, policies, and promotional offers. You will receive messages about product updates, service notifications, and special offers. You can opt out at any time.</li><li>• <b>Service Provision:</b> To perform the contract we are about to enter into or have entered into with you.</li><li>• <b>Marketing and Communications:</b> To send you marketing materials and communicate with you about our services.</li><li>• <b>Prospecting:</b> To analyze your data to understand your preferences and prospects for new clients.</li></ul>

	<ul style="list-style-type: none"> <li>• Customer Support: To respond to your inquiries and provide support.</li> </ul>
<p><b>You have the following rights regarding your personal data:</b></p>	<ul style="list-style-type: none"> <li>• You can request access to the personal data we hold about you.</li> <li>• You can request correction of any incomplete or inaccurate data we hold about you.</li> <li>• You can request deletion of your personal data where there is no good reason for us to continue processing it.</li> <li>• You can object to the processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation that makes you want to object to processing on this ground.</li> <li>• You can request restriction of processing of your personal data.</li> </ul>
<p><b>Opt-Out Options &amp; Mobile Information</b></p>	<p>You have the right to opt out of receiving marketing communications from us at any time by:</p> <ul style="list-style-type: none"> <li>• SMS: Replying "STOP" to any SMS message you receive from us. Email: Clicking the "unsubscribe" link in any email you receive from us.</li> <li>• Account Settings: Updating your preferences in your account settings on our website.</li> </ul> <p>More on mobile information usage, collection, and privacy</p> <ul style="list-style-type: none"> <li>• Our SMS program provides updates, notifications, and promotional messages related to our services. By subscribing to our SMS program, you consent to receive SMS messages at the phone number provided. Message frequency may vary based on your interaction with our service.</li> <li>• We do not share your mobile information with third parties or affiliates for marketing or promotional purposes. Additionally, all the categories of personal data mentioned above exclude text messaging originator opt-in data and consent. This information will not be shared with any third parties under any circumstances. However, we may share your data with trusted service providers who assist us in operating our SMS program, provided they agree to keep your data confidential and use it solely for the purpose of providing services on our behalf.</li> <li>• You have the right to access, correct, verify, or remove your personal information at any time. To manage your information, please contact us at <b>1(513)984-9933</b>.</li> <li>• Opt-Out Option: If you wish to opt-out of receiving SMS messages, you may do so at any time by replying "STOP" to any of our messages or by contacting us directly at <b>1(513)984-9933</b>. Opting out will not affect your other interactions with our services.</li> </ul>
<p><b>Changes to this Privacy Policy</b></p>	<p>We may change this Privacy Statement from time to time when necessary to reflect changes in our Services, how we use personal information, or the applicable law. If we make changes, we will revise the "Last Updated" date at the top of the statement. If we make material changes, we will provide you with notice or obtain consent regarding such changes as may be required by law. We encourage you to review the Privacy Statement whenever you access the Services or otherwise interact with us to stay informed about our privacy practices and the ways in which you can exercise choice over these practices. The practices described in this Privacy Statement are subject to applicable laws in the locations in which we operate.</p>

**Other important information** You may have other privacy protections under applicable state laws. To the extent these state laws apply, we will comply with them when we share information about you.