CLIENT PRIVACY NOTICE

Harlow Capital Management, LLC

CRD No.: 133918

Effective Date: August 14, 2026 | Amended 18 August 2026, version 2026.1

1. ABOUT THIS NOTICE AND SCOPE

This Privacy Notice (“Notice”) is provided by Harlow Capital Management, LLC (“Harlow,” “we,” “our,” or “us”), a registered investment adviser with the U.S. Securities and Exchange Commission (“SEC”), CRD No.: 133918. Our principal place of business is located in Dallas, Texas.

This Notice applies to current and former clients and prospective clients who are natural persons (individuals) (“consumers”). It describes how we collect, use, disclose, and protect nonpublic personal information (“NPI”) and “customer information” as defined under Regulation S-P. This Notice does not apply to institutional clients that are not natural persons (e.g., corporations, trusts, or entities), although we extend equivalent protections to such clients as a matter of firm policy.

We provide this Notice at the commencement of our advisory relationship. Pursuant to the exception codified in Regulation S-P 248.5(e) (as amended, effective December 3, 2024), we are not required to deliver a separate annual notice so long as: (i) we share NPI with nonaffiliated third parties only as permitted under the exceptions to opt-out (248.13–15), and (ii) our privacy policies and practices have not changed materially since the most recent notice delivered to you. We will deliver a revised notice promptly if either condition ceases to be satisfied.

2. INFORMATION WE COLLECT

In the course of providing investment advisory services, we collect the following categories of NPI and customer information:

- Identifiers: Full legal name, date of birth, Social Security Number or Tax Identification Number, government-issued identification numbers (driver’s license, passport), postal address, email address, and telephone numbers.
- Financial account data: Investment and brokerage account numbers, bank account information, account balances, income, net worth, assets and liabilities, tax returns, W-2s, and 1099s.
- Investment profile data: Risk tolerance, investment objectives, time horizon, liquidity needs, existing holdings, prior investment experience, and suitability information.
- Transaction data: Records of all securities transactions, account activity, advisory fee billings, and transaction confirmations.
- Professional and relationship information: Employer, business affiliations, estate planning documents, trust agreements, beneficiary designations, and names of other professional advisers (e.g., attorney, CPA, trustee).
- Sensitive personal information (as defined under Texas B&C Code 521.002): Social Security Number, government-issued ID numbers, financial account numbers, and access credentials. We treat such information with heightened safeguards.
- Communications: Correspondence, emails, and records of meetings and telephone calls retained pursuant to applicable securities law recordkeeping requirements.

We collect this information: (a) directly from you through account-opening documents, financial planning questionnaires, and ongoing communications; (b) from account custodians and broker-dealers acting on your behalf; (c) from consumer reporting agencies, credit bureaus, or public records; and (d) from third-party data providers in connection with compliance and fraud prevention activities.

3. HOW WE USE YOUR INFORMATION

We use your NPI and customer information solely for the following legitimate business purposes:

- Providing, managing, and personalizing investment advisory services consistent with your stated objectives, risk tolerance, and financial circumstances.
- Performing ongoing portfolio monitoring, rebalancing, performance reporting, and account administration.
- Processing transactions and communicating with your account custodian(s) and broker-dealer(s) on your behalf.
- Complying with applicable federal and state securities laws (including the Investment Advisers Act of 1940, SEC rules and regulations, and Texas securities laws), tax reporting and withholding obligations, and responding to regulatory examinations.
- Detecting, preventing, and investigating fraud, unauthorized transactions, identity theft, money laundering, and other illegal or improper activity.
- Complying with anti-money laundering (AML) obligations and Know Your Customer (KYC) requirements.
- Maintaining and improving internal business operations, recordkeeping, and client service functions.
- Exercising or defending legal claims.

4. INFORMATION WE SHARE — CATEGORIES AND OPT-OUT RIGHTS

We do not sell your NPI or customer information. We do not share your NPI with nonaffiliated third parties for their own independent marketing or commercial purposes. Consistent with Regulation S-P 248.13–15, we may share your NPI in the limited circumstances described below.

4.1 Permitted Sharing — No Opt-Out Right Available. Under Regulation S-P, we may share NPI without offering an opt-out in the following circumstances, and we currently limit our sharing to these categories:

- Service providers: Nonaffiliated companies that perform services on our behalf, including your account custodian(s), attorneys, accountants, tax preparers, technology providers, compliance consultants, and cybersecurity vendors. These parties receive only the NPI necessary to perform their functions and are contractually obligated to maintain its confidentiality and use it solely for the purposes of the services rendered (see Section 6 for vendor oversight details).
- Legal and regulatory requirements: Disclosure required or permitted by law, including to the SEC, FINRA, the Texas State Securities Board, law enforcement agencies, or pursuant to a court order, subpoena, or legal process. This includes disclosures made in connection with regulatory examinations of our firm.
- Protection against fraud or legal liability: Disclosure to financial institutions or other parties to the extent permitted under Regulation S-P 248.15 in connection with preventing actual or potential fraud or unauthorized transactions, resolving customer disputes or inquiries, or complying with applicable legal requirements.

4.2 Sharing That Requires Opt-Out Opportunity. We do not currently engage in any sharing of NPI with nonaffiliated third parties that would require us to provide you with an opt-out opportunity under Regulation S-P 248.7–9. Should our practices change in a manner that triggers such opt-out rights, we will deliver a revised Notice to you with a reasonable opt-out period (not less than 30 days) and an accessible, clearly-described method for exercising that right before any such sharing begins.

4.3 Affiliates. Harlow Capital Management, LLC has affiliates under common control with the Firm. These include Arbco, L.L.C., which serves as general partner to the private funds we advise, and those funds themselves. We do not share your NPI with our affiliates for marketing purposes and we do not sell it. Where information is shared with an affiliate, it is shared only as necessary to administer an investment you have made in a fund we advise, or as otherwise permitted by law. If our practices change in a manner that requires it, we will update this Notice and, where required by law, give you the opportunity to limit affiliate sharing before any such sharing occurs.

4.4 With Your Written Consent. We may share NPI with other parties (e.g., co-advisers, family members, or entities you designate) when you provide prior written authorization. You may revoke such authorization at any time by notifying us in writing, and revocation will be effective within a reasonable time after receipt.

5. HOW TO EXERCISE YOUR PRIVACY RIGHTS

Although we do not currently engage in sharing that triggers opt-out rights, you have the following rights with respect to your NPI at any time:

- Right to request access: You may request a description of the categories of NPI we hold about you and how it is used.
- Right to request correction: You may request that we correct inaccurate NPI we hold about you.
- Right to limit third-party sharing: You may at any time direct us in writing not to share your NPI with your other professional advisers (e.g., your CPA or estate planning attorney), even where such sharing is otherwise permitted.
- Right to opt out (if applicable): If we ever begin sharing your NPI in a manner that triggers an opt-out right, we will provide you with notice and the mechanism to opt out before such sharing begins.

To exercise any of the above rights, contact our Chief Compliance Officer in writing using the contact information in Section 13. We will acknowledge your request within ten (10) business days and respond fully within thirty (30) calendar days.

6. HOW WE PROTECT YOUR INFORMATION — SAFEGUARDS PROGRAM

Harlow Capital Management maintains a written information security program (“WISP”) as required by Regulation S-P 248.30 (amended 2024) and consistent with the Texas Identity Theft Enforcement and Protection Act (Tex. Bus. & Com. Code 521.052). Our WISP is reviewed and updated at least annually and is designed to protect the confidentiality, integrity, and availability of your NPI and customer information. Our safeguards include:

Physical Safeguards

- Locked file storage and restricted physical access to office spaces where NPI is stored or processed.
- Secure destruction of paper records containing NPI (cross-cut shredding or equivalent methods) prior to disposal, consistent with Regulation S-P’s Disposal Rule (248.30(b)(4)).
- Visitor access controls and clean-desk policies for workspaces where NPI is visible.

Electronic and Cybersecurity Safeguards

- Encryption of NPI and customer information in transit (TLS 1.2 or higher) and at rest where technically feasible.
- Multi-factor authentication (MFA) required for all systems and applications that store or process NPI.
- Network firewalls, endpoint detection and response (EDR), anti-malware, and intrusion detection/prevention controls.
- Regular security patching and vulnerability assessments for all systems handling NPI.

- Secure, access-controlled email systems; clients are encouraged to notify us if they prefer encrypted delivery of sensitive documents.

Administrative Safeguards

- Access to NPI is restricted on a strict need-to-know basis. Employees and contractors are granted access only to the NPI required to perform their specific job functions.
- All personnel with access to NPI receive initial and ongoing privacy and information security training.
- Background checks are conducted on employees and contractors with access to sensitive NPI prior to hire or engagement.
- Annual review of the WISP by the Chief Compliance Officer ("CCO"), with updates as required by changes in operations, technology, or applicable law.

Vendor and Third-Party Oversight

- Prior to engaging any service provider with access to NPI, we conduct due diligence on their information security practices.
- All service providers with access to NPI are required by written contract to: (i) implement and maintain appropriate information security safeguards; (ii) use NPI only for the purpose of performing services for us; and (iii) notify us promptly of any security incidents involving NPI.
- We periodically review service provider security practices and contractual compliance as required by Regulation S-P 248.30(a)(3).

Please be aware that no method of electronic transmission or data storage is completely secure. While we employ commercially diligent controls aligned with applicable regulatory guidance, we cannot guarantee absolute security. We will notify you of any security incident as described in Section 7.

7. DATA BREACH AND INCIDENT RESPONSE — DUAL NOTIFICATION OBLIGATIONS

Harlow Capital Management maintains a written Incident Response Program ("IRP") as required by Regulation S-P 248.30(a)(2). In the event of unauthorized access to or use of your NPI or customer information, we comply with the following overlapping federal and Texas notification requirements:

Federal Requirement — SEC Regulation S-P (17 C.F.R. 248.30, as amended)

If we become aware that an incident involving unauthorized access to or use of your "sensitive customer information" has occurred, or is reasonably likely to have occurred, and the information has been or is reasonably likely to be used in a manner that creates a reasonably likely risk of substantial harm or inconvenience to you, we will:

- Notify you as soon as practicable, but not later than thirty (30) calendar days after we become aware that such an incident has occurred or is reasonably likely to have occurred.
- Provide notice in a clear and conspicuous manner that includes: (i) a description of the incident; (ii) the type of sensitive customer information involved; (iii) the approximate date of the incident; (iv) a description of what we are doing to investigate, contain, and remediate the incident; and (v) steps you can take to help protect yourself from potential harm.

Texas State Requirement — Texas Identity Theft Enforcement and Protection Act (Tex. Bus. & Com. Code § 521.053)

If we discover or receive notification of a breach of system security involving your sensitive personal information (as defined under Texas law, including SSN, financial account numbers, and government-issued ID numbers), we will:

- Notify each affected Texas resident as soon as practicable, but not later than sixty (60) calendar days after determining that the breach occurred.
- Include in the notice to affected individuals: (i) a description of the breach; (ii) the type of sensitive personal information involved; (iii) contact information for our firm and applicable consumer reporting agencies; (iv) a description of steps we are taking; and (v) steps you can take to protect yourself, including placing a security freeze on your credit reports.

The more stringent requirement will govern in the event of any conflict. Both notification obligations may be triggered by the same incident. Notice to affected clients will be provided by: (1) written letter to your address of record; (2) electronic notice if you have elected electronic delivery and the email channel is not believed to be compromised; or (3) substitute notice (website posting plus email/newspaper notice) if direct notification is not practicable due to cost or lack of contact information, as permitted by applicable law.

We maintain records of all security incidents, our investigation, notification, and remediation steps as required by our IRP and applicable recordkeeping obligations.

8. RECORDKEEPING AND RETENTION

We retain your NPI and customer information for as long as necessary to fulfill the purposes described in this Notice and to comply with all applicable law and regulatory requirements. Key retention benchmarks include:

- Investment Advisers Act Rule 204-2 requires registered investment advisers to retain books and records, including client records, for a minimum of five (5) years from the end of the fiscal year in which the record was created, with the first two (2) years in an easily accessible location.
- SEC examination and enforcement obligations may require us to retain records for longer periods in specific circumstances.
- We may retain NPI for additional periods to the extent required by applicable tax law, legal holds, litigation requirements, or other legitimate business necessity.

When NPI is no longer required for any of the above purposes, we dispose of it securely in a manner designed to prevent unauthorized access, consistent with our WISP and the Disposal Rule under Regulation S-P 248.30(b)(4).

9. FORMER CLIENTS

When the advisory relationship between you and Harlow Capital Management has ended, we will continue to protect your NPI in accordance with this Notice and all applicable law. We will not share your NPI with nonaffiliated third parties except as permitted by Regulation S-P 248.13–15 and applicable Texas law. Records of former clients are retained for the periods described in Section 8.

10. TEXAS-SPECIFIC DISCLOSURES

For Texas residents, we provide the following additional disclosures:

10.1 GLBA Entity Exemption from TDPSA. Harlow Capital Management, LLC is a financial institution subject to Title V of the Gramm-Leach-Bliley Act (GLBA) and Regulation S-P. As a result, our handling of client NPI is exempt from the Texas Data Privacy and Security Act (TDPSA), Tex. Bus. & Com. Code Ch. 541, which otherwise applies to businesses in Texas. However, we voluntarily adopt privacy practices consistent with the spirit of the TDPSA as a matter of best practice, including the consumer rights described in Section 5.

10.2 Texas Identity Theft Enforcement and Protection Act. We are subject to and comply with the Texas Identity Theft Enforcement and Protection Act (Tex. Bus. & Com. Code 521.001), which requires us to maintain reasonable security procedures to protect your sensitive personal information and to comply with the breach notification obligations described in Section 7.

10.3 Texas State Securities Board. Harlow Capital Management is registered with the SEC as an investment adviser. Our regulatory filings, including Form ADV, are publicly accessible on the SEC's Investment Adviser Public Disclosure ("IAPD") database at www.adviserinfo.sec.gov. Texas clients may also contact the Texas State Securities Board ("TSSB") with questions about investment advisers operating in Texas at (512) 305-8300 or www.ssb.texas.gov.

10.4 Civil Remedies and Enforcement. The Texas Attorney General has exclusive authority to enforce the Texas Identity Theft Enforcement and Protection Act. Violations may result in civil penalties ranging from $2,000 to $50,000 per violation, with additional penalties of up to $100 per individual who should have received breach notification but did not, up to a maximum of $250,000 per breach incident. There is no private right of action under these Texas provisions.

11. ELECTRONIC COMMUNICATIONS DISCLOSURE

We use email and other electronic means to communicate with clients, including delivery of account statements, performance reports, trade confirmations, and other advisory communications. You should be aware that:

- Standard email communications may not be fully encrypted in transit and may be susceptible to interception by unauthorized parties.
- We use commercially reasonable encryption and secure delivery systems where available (e.g., encrypted email portals for delivery of account statements and sensitive documents). Please contact us to request delivery via an encrypted portal if you have concerns.
- If you choose to communicate with us via standard (unencrypted) email, you accept the risk that such communications may not be fully confidential.
- Electronic signatures and electronic delivery of account documents are governed by our Electronic Communications Consent Agreement, a copy of which is available upon request.

If you prefer to receive all communications and documents via U.S. mail or wish to revoke a prior consent to electronic delivery, please notify our CCO in writing. We will honor such requests within a reasonable time.

12. CHANGES TO THIS NOTICE

We reserve the right to amend this Privacy Notice at any time consistent with applicable law. We will provide you with a revised notice in the manner required by Regulation S-P before implementing any change in our privacy policies and practices that would require us to do so. We will also make the current version of this Notice available at our office and, if applicable, on our website. The "Effective Date" at the top of this Notice identifies when the current version took effect. Material changes will be clearly identified.

13. CONTACT US

Questions, concerns, or requests to exercise your privacy rights should be directed to our Chief Compliance Officer:

Harlow Capital Management, LLC
Chief Compliance Officer
Address: P.O. Box 190136, Dallas, TX 75219
Phone: (214) 754-0800
Compliance Email: colby@harlow-capital.com
Website / IAPD: www.adviserinfo.sec.gov (CRD No.: 133918)
Texas State Securities Board: (512) 305-8300 • www.ssb.texas.gov

CLIENT ACKNOWLEDGEMENT OF RECEIPT - OPTIONAL

(Optional. You are not required to sign or return this page. Regulation S-P requires that we deliver this Notice to you, not that you acknowledge it. If you would like a signed copy on file, please return this page.)

By signing below, I/we acknowledge receipt of the Harlow Capital Management, LLC Client Privacy Notice and confirm that I/we have had the opportunity to review its contents. I/we understand my/our rights under Regulation S-P, the Texas Identity Theft Enforcement and Protection Act, and the firm's information sharing and data protection practices as described herein.

Client Name (Print)	Client Signature
Joint/Spouse Name (Print, if applicable)	Joint/Spouse Signature
Date	Adviser Representative (Print & Sign)