

FACTS	WHAT DOES HORNOR, TOWNSEND & KENT, LLC 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: <ul style="list-style-type: none"> ▪ Account number, Social Security number, date of birth ▪ Net worth, account balances, income, investment experiences and objectives ▪ Transaction history ▪ Name, address, email, telephone number ▪ Medical information (if applying for insurance)
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 Hornor, Townsend & Kent, LLC ("HTK") chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does HTK share?	Can you limit this sharing?
For our everyday business purposes – such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus. Additionally, we will share your information to the extent necessary to service or process an investment product or service that you requested or authorized. For example, we share customer information with our clearing firm, so that you can receive statements, trading confirmations, monthly and quarterly account statements, reorganization notices, and proxy information. For clients with investment advisory accounts, we share information with investment companies and fund managers in order to enable them to make asset allocation and fund investment decisions. We are also permitted to disclose customer information to third-party companies that perform services for us which have agreed to certain contractual protections regarding the use and disclosure of your information.	Yes	No
For our marketing purposes – to offer our products and services to you, including customer relationship management ("CRM") hosts or other parties utilized by representatives to help manage your account(s) on our behalf.	Yes	No
For joint marketing with other financial companies	Yes	No
For our affiliates' everyday business purposes – information about your transactions and experiences.	Yes	No
For our affiliates' everyday business purposes – information about your credit worthiness.	No	No, we don't share
As required by law or with your consent – We share information with your consent or at your direction; to your legal representative as may be necessary; in response to a subpoena or request from a regulator; or to comply with federal, state or local laws and to protect against fraud	Yes	No
For nonaffiliates to market to you	No	No, we don't share
If your representative leaves HTK – If the representative servicing your account(s) leaves HTK to join another financial institution, the representative may retain copies of your personal information so that he or she can continue to work with you at the new financial institution. In doing so, your representative may share your information with the new firm but is otherwise required to keep confidential the personal information obtained from you while the representative was affiliated with HTK, and he or she may use it only to service your account(s). HTK will also continue to retain copies of your account documentation for regulatory compliance purposes. Please note: Certain states require affirmative consent to allow sharing. See below for more on your rights under state law. In the event that an HTK representative terminates his or her relationship with HTK, and you want to follow your representative to his or her new firm, please do not request to limit our sharing.	Yes	Yes

To limit our sharing	Detach and mail this entire page to: HTK, 600 Dresher Rd, Horsham, PA 19044
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Questions?	Call 1-800-873-7637 or go to www.HTK.com
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For residents outside California and Vermont:

If the representative who services your account(s) were to leave HTK, we will allow the representative to retain copies and share information with their new firm unless you tell us otherwise. You can opt-out of allowing the representative to share your information with their new firm, if they were to leave HTK, by checking the box and filling out the form below:

<input type="checkbox"/> In the event the representative servicing my account leaves HTK, do <i>not</i> allow my representative to retain copies and share my information with their new firm. I understand this may limit my representative's ability to continue to provide services to me.	
Name:	Mail to:
Address:	Hornor, Townsend & Kent, LLC
	600 Dresher Road
City, State, Zip:	Horsham, PA 19044
Account #:	

For California and Vermont residents only:

If the representative who services your account(s) were to leave HTK, we will not allow the representative who services your account to retain copies and share information with their new firm unless we receive your express consent. You may provide your consent for your representative to share your information with their new firm, if they were to leave HTK, by checking the box and filling out the form below:

<input type="checkbox"/> In the event the representative servicing my account leaves HTK, <i>do</i> allow my representative to retain copies and share my information with their new firm so the representative can continue to provide services to me.	
Name:	Mail to:
Address:	Hornor, Townsend & Kent, LLC
	600 Dresher Road
City, State, Zip:	Horsham, PA 19044
Account #:	

Who are we	
Who is providing this notice?	Hornor, Townsend & Kent, LLC, a dually registered investment advisor and broker-dealer, and its subsidiaries, and affiliates (“HTK”). HTK distributes a variety of financial products and services to you through a network of financial professionals who are independent registered representatives, investment adviser representatives and insurance agents (“representatives”).

What we do

How does HTK protect my personal information?	<p>To protect your personal information from unauthorized access and use, we use security measures that comply with federal and state law. These measures include computer safeguards and secured files and buildings.</p> <p>HTK recognizes the need to prevent unauthorized access to the information we collect, including information held in electronic format, and we use commercially reasonable technical and physical security measures to protect your personal information in the following ways:</p> <ul style="list-style-type: none"> ▪ We only grant access to your personal information to parties who are contractually bound to keep this information confidential and who need that information to serve you or to assist us in conducting our operations, and who agree to safeguard your personal information. ▪ We have physical and electronic safeguards in place designed to ensure that we comply with our own policy, industry practices, and federal and state regulations. ▪ Our employees and independent contractors are trained in the proper handling of personal information. ▪ If you decide to close your account(s) or become an inactive customer, we will adhere to the privacy policies and practices as described in this notice.
How does HTK collect my personal information?	<p>HTK collects your personal information, for example, when you:</p> <ul style="list-style-type: none"> ▪ open an account, sign an investment advisory contract, or deposit or transfer money ▪ give us information about your income, assets, investment experience, risk profile or investment objectives ▪ complete an insurance application. <p>HTK also collects your personal information from nonaffiliated third parties, such as custodians, employers, benefit plan sponsors, associations and other institutions, if you transfer positions or funds to HTK.</p>
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only:</p> <ul style="list-style-type: none"> ▪ sharing for affiliates' everyday business purposes – information about your creditworthiness ▪ affiliates from using your information to market to you ▪ sharing for nonaffiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.</p>
What happens when I limit sharing for an account I hold jointly with someone else?	Your choices will apply to everyone on your account.

Definitions

Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> ▪ The Penn Mutual Insurance Company
Nonaffiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> ▪ These may include insurance companies other than The Penn Mutual Insurance Company, broker-dealers, investment advisors, mutual fund companies, banks, investment firms, third party administrators, clearing firms, benefit plan sponsors and other third parties.
Joint marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

Other important information

If you live in an “opt-in” state, such as California or Vermont, where we are required to obtain your affirmative consent to share your nonpublic personal information with nonaffiliated third parties who do not currently assist us in servicing your account or conducting our business, your representative is required to obtain your consent before your representative can take your information with him or her should your representative leave HTK. Please see the mail-in form attached to this notice in order to “opt-in” and allow your representative, if they were to leave HTK, to take this information with them and continue to service you. **California residents:** For accounts with a California mailing address, we will not share your personal information with a financial company for joint marketing purposes, except as required or permitted by law. **Vermont residents:** For accounts with a Vermont mailing address, we will not share your creditworthiness information with our affiliates, except as required or permitted by law. For joint marketing with other financial companies, we will disclose only your name, contact information, and information about your transactions, unless otherwise required or permitted by law. Please note that information about you that we obtain from a report prepared by an insurance-support organization may be retained and disclosed by that organization.

