

Privacy Policy

This privacy policy (the “Policy”) describes how Harbor Capital Advisors, Inc., Harbor Services Group, Inc., Harbor Funds Distributors, Inc., Harbor Trust Company, Inc., Harbor Funds, Harbor Funds II, and Harbor ETF Trust (collectively, “Harbor” “we” or “us”) collects, uses, and discloses personal information associated with your identity. You agree to the practices regarding your personal information described in this Policy when you use our website located at harborcapital.com (the “Site”) or other Harbor services that link to this Policy, whether online or offline.

This Policy does not apply to all personal information that Harbor collects. It does not cover any personal information that is subject to our Privacy Notice for Investors or our Privacy Notice for Employees, which supersede this Policy. If you are a California resident to whom this Policy applies, please review the California Addendum that can be found at the end of this Policy.

This Policy was updated as of March 14, 2025, and may be updated from time to time.

Personal Information We Collect

The types of personal information about you that we collect and share will depend on your relationship with Harbor and how you interact with us. We may collect information directly from you, your representative or other organizations, either on paper or online, including automatically as you interact with the Site and other Harbor services, and from third parties who are acting on our behalf. Examples of personal information we collect may include, among other things, your mailing or email address and phone number as well as information collected through your use of the Site and other Harbor services. We may receive personal information about the employees or representatives of businesses with which we interact. In addition to personal information you provide to us, we may receive information about you that you authorize other parties to provide to us.

We may collect personal information directly from you when you submit a request through the Site, send us a message through the Site, or otherwise attempt to contact us through the Site. When you create an account on the Site, you may submit certain identifiers to us such as your name, address, email address, telephone/fax numbers, account number, social security or taxpayer identification number, date of birth, assets, income, account balances, bank account information, username, and password. We may also obtain personal information through Harbor services or from service providers not affiliated with Harbor in order to verify your identity, to prevent fraud, or to help us identify products and services that may be of interest to you.

We use a variety of online technologies, as described further below, to collect information that helps us understand how the Site and mobile application are used and how individuals interact with emails and other documents that we distribute. For example, each time you visit the Site, we may automatically collect technical and navigational information, such as browser type, device type, device ID, Internet Protocol (“IP”) address, pages visited, average time spent on our Site, searches performed on our Site, and information about your interactions with our advertisements.

Cookies and Similar Technologies. A cookie is a small text file that is stored on your device when you visit a website or a mobile application. Cookies usually store small bits of information about you and what you do on that site or application, which are then used to improve your browsing experience. Some cookies are only used during a single visit, while others are saved on your device until your next visit.

The Site may use both types of cookies to make your visits more productive and to improve the Site. Cookies allow us to keep track of your use of the Site, facilitate Site navigation, validate your identity, remember your password and preferences, and improve the quality and security of the Site.

We also use third-party companies to provide marketing services on our behalf, who may place cookies during your use of the Site. These cookies collect information about your use of the Site, including links that lead you to or from our Site, pages visited, and amount of time spent on the Site.

Generally, you can set your browser not to accept cookies or to notify you if you are sent a cookie, giving you the opportunity to choose whether or not to accept the cookie. Please note that your choices will be specific to the browser and device on which you decide not to accept cookies, and that not accepting cookies may interfere with certain features of the Site.

Web Beacons and Pixels. We also use web beacons, sometimes known as a pixel tag or clear GIF, to collect usage data. A web beacon is a clear graphic image (typically one pixel in size) delivered through a web browser or email. A web beacon helps to measure usage and activity and reports that activity back to the system providers. In some cases, a web beacon triggers the placement of a cookie on your device.

We and our service providers use web beacons and cookies to determine things like if and when you open our emails, what type of device, operating system, email program, or web browser you are using, your IP address, and what links you click within our site or email. These things enable us to gauge the effectiveness, relevance, and value of our content and communications.

We also use tracking pixels for remarketing and engagement purposes. This means that when you use our Site, you may see ads about Harbor on other sites you subsequently visit. We use third-party service providers to collect information about who views and clicks these ads across the Internet in order to understand our customers better and optimize our services.

For more information on opting out of tracking pixels and other technologies generally, visit <https://optout.networkadvertising.org/?c=1>.

Do Not Track Disclosure

Our third-party vendors may collect information about users across our Site. We do not currently have the capability to respond to a web browser that does not track signals or other mechanisms that provide you with the ability to exercise choice regarding the collection of this information.

How We Disclose Your Personal Information

We may disclose personal information that we collect:

- To contractors and service providers we use to support our business.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Harbor's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by Harbor is among the assets transferred.
- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce or apply our terms of use, or if we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Harbor or others.

- To investigate suspected fraud, threats, or other violations of any law, rule or regulation, the Site's rules or policies, or the rights of third parties or to investigate any suspected conduct which we deem improper.
- To fulfill the purpose for which you provided the personal information. and
- For any other purpose disclosed by us when you provided the information, or with your consent.

How We Use Your Personal Information

We may use your personal information to provide the Site to you, to provide you with information about our products or services, or to fulfill any request that you submit to us. We may also use your personal information for the following purposes:

- Maintain and improve the Site and provide you with relevant information.
- Send you technical notices, updates, security alerts and support and administrative messages.
- Advertising and marketing our products or services to you.
- Auditing related to a current interaction with you, including, but not limited to, counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards.
- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.
- Debugging to identify and repair errors that impair existing intended functionality.
- Performing services such as by offering the Site, providing customer service, responding to inquiries or requests, or similar services.
- Comply with our legal and financial obligations. and
- Carry out any other purpose described to you at the time the information was collected.

Security

Harbor has reasonable safeguards in place to help protect the personal information that Harbor collects from loss, misuse, and unauthorized access or disclosure. Although Harbor attempts to protect the personal information in our possession, please be aware that no data security measures can guarantee security from unauthorized activity.

Links

Our Site may contain certain links to third party websites. When you visit our Site and leave to go to another linked site, we are not responsible or liable for the content or availability of the linked site. Please be advised that if you enter into a transaction on the third-party site, we do not represent either the third party or you. Further, the privacy and security policies of the linked site may differ from ours.

Children

The Site is not intended for or directed to children who are under the age of 16. Harbor does not knowingly collect personal information from children under the age of 16. If you have reason to believe that a child under the age of 16 has provided personal information to Harbor through the Site, please contact us and we will endeavor to delete that information from our databases.

Transfer of Information to the United States

We are based in the United States and the information we collect is governed by U.S. law. By accessing or using the Site or otherwise providing information to us, you consent to the processing and transfer of information in and to the U.S.

Changes to this Policy

We reserve the right to change or revise this Policy at any time. New updates to this Policy will be posted to our Site. Unless otherwise specified, changes will be effective upon the date listed above. Please check this Policy regularly to ensure that you are aware of any changes. We may try to notify you of material changes to this Policy, which if we do so may be by means such as by posting a notice directly on the Site, by sending an e-mail notification (if you have provided your e-mail address to us), or by other reasonable methods. .

Contact Us

If you have any questions or concerns about how we maintain the privacy of your personal information or if you would like to update your personal information on file, please contact us at 800-422-1050 Monday through Friday, between the hours of 8:00 a.m. and 6:00 p.m. Eastern time. You may also write to us at the following postal address:

Harbor
c/o Harbor Services Group, Inc.
PO Box 804660
Chicago, IL 60680-4108

California Addendum

This part of the Policy applies to residents of California. When we use the term “personal information” in this section, we mean information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household as set forth in the California Consumer Privacy Act (“CCPA”). You should be aware that CCPA personal information does not include all personal information that Harbor collects, including any personal information that is subject to our Privacy Notice for Investors [\[link\]](#).

California Personal Information We Collect

We have collected the following categories of personal information from California residents within the last twelve months. This personal information was collected directly from you or automatically through usage of the Site and/or other Harbor services.

Category	Examples of personal information within this category that Harbor collects
Identifiers	Identifiers, such as your name, postal address, unique personal identifier, online identifier, internet protocol address, email address, phone number, or other similar identifiers;
Personal information categories listed in the California Customer Records statute	Information described as personal information by law, including the identifiers listed in the row above;
Commercial information	Records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies;
Internet or other similar network activity	Browsing history, search history, or information on your use or interaction with a Harbor website or application;
Geolocation data	Physical location when using the Site;
Inferences drawn from other personal information	Details reflecting preferences, characteristics, or predispositions

Use of California Personal Information

For each of these categories of personal information, we use the personal information as described above in this Policy under “How We Use Your Personal Information.”

We have disclosed the above categories of personal information for the above business purposes over the last twelve months, as further described above under “How We Disclose Your Information.”

Sales and Sharing of Personal Information

Under the CCPA, a ‘sale’ is defined broadly to include disclosing or making available personal information to a third-party in exchange for monetary compensation or other benefits or value, and ‘share’ broadly includes disclosing or making available personal information to a third party for purposes of cross-context behavioral advertising. As such, while we do not disclose personal information to third parties in exchange for monetary compensation, we may, pursuant to the CCPA or other applicable law, sell or share personal information with advertising networks and third party ad companies and data analytics providers in order to analyze use of the Site, optimize and develop our products and services, improve and measure our ad campaigns, and reach users with more relevant ads and content. However, we do not knowingly sell or share personal information about individuals who are younger than 16.

Children

As further described in “Children” above, Harbor does not knowingly collect personal information from children under the age of 16.

Retention

Harbor will retain your personal information as needed to fulfill the purposes for which it was collected. Harbor will retain and use your personal information as necessary to comply with Harbor’s business requirements, legal obligations, resolve disputes, protect our assets, and enforce our agreements.

Your California Privacy Rights

If you are a California consumer, you may have certain rights related to your personal information under the CCPA, including the right to: (i) request additional disclosures about the personal information we collect, use, and share; (ii) request access to and deletion of your personal information, subject to certain exceptions; (iii) opt out of the sale and sharing of your personal information; (iv) correct inaccurate personal information that we maintain about you; (v) limit the use and disclosure of sensitive personal information; and (vi) obtain a copy of your personal information.

If you wish to exercise any of these rights, please contact us at 800-422-1050 or <https://harborcapital.com/contact-us>. You may also send a request to us via mail at Harbor Capital Advisors, attn: Data Protection Officer, PO Box 804660, Chicago, IL 60680-4108, or call us toll-free at 800-422-1050. We will process your request within the timeframe provided by applicable law. The rights described herein are not absolute and we reserve all of our rights available to us at law in this regard. You may have the right to appeal our decision with respect to a request you have submitted by emailing us at info@harborcapital.com. Additionally, if we retain your personal information only in de-identified form, we will not attempt to re-identify your data in response to a privacy rights request.

If you make a request related to personal information about you, we will need to verify your identity. To do so, you may be required to supply a valid means of identification or other information as a security precaution. If you make a request through an authorized agent, we will require written proof that the agent is authorized to act on your behalf. We will process your request within the time provided by applicable law.

The CCPA prohibits covered businesses from discriminating against you for exercising your CCPA rights. Harbor will not discriminate against you for exercising any of these rights, for example, by charging a different price or denying goods or services. However, we may charge a different price or rate or provide a different level or quality of goods or services when that difference is reasonably related to the value provided to us by the data.

California "Shine the Light" Law

Under California Civil Code Section 1798.83, Californians are entitled to request information relating to whether a business has disclosed Personal information to any third parties for the third parties' direct marketing purposes. Californians who wish to request further information about our compliance with this statute or who have questions, more generally, about our Policy and our privacy commitments and our Site should contact us at <https://harborcapital.com/contact-us> or at Harbor, c/o Harbor Services Group, Inc., PO Box 804660, Chicago, IL 60680-4108.