

Marble Harbor Investment Counsel, LLC

Privacy Notice

Marble Harbor Investment Counsel is committed to keeping your non-public personal information (“Information”) secure and confidential. We do not disclose your Information to anyone unless it is required or permitted by law, at your direction, or is necessary to provide our advisory services to you or on your behalf. The following information is intended to provide you with a better understanding of our privacy policy with respect to your Information.

Information We Collect

Marble Harbor collects and maintains your Information in the course of providing you with advisory services. This Information is received from the following sources:

- Information that you provide to us on forms and through discussions with you, to open and maintain your account, such as your name, address, telephone number, Social Security number, birth date, email address, driver’s license, income and financial information;
- Information that we generate to service your account, such as transactional activity, portfolio appraisals, account statements and internal reports;
- Information we may receive from third parties with respect to your account, such as trade confirmations and custodial statements; and
- Information we receive from your third-party representatives, such as your attorney or accountant.

Sharing Information with Third Parties

Marble Harbor may share your Information with nonaffiliated third parties as permitted or required by law, or as authorized by you. For example, we may share your Information under the following circumstances:

- To other firms as directed by you, such as accountants, lawyers and trust administrators;
- To specified family members (as authorized by law and/or you);
- To third parties that assist us in servicing your account, such as custodian or broker;
- To third parties that perform or provide services for us, such as accounting firms, software vendors, technology consultants, system and data providers; and
- To government agencies, other regulatory bodies, law enforcement officials, or other organizations as permitted or required by law, such as to fulfill legal and regulatory obligations.

Our service providers are obligated to keep the Information we share with them confidential and use it only to provide services specified by Marble Harbor.

How We Protect Your Information

Marble Harbor will internally safeguard your Information by restricting access to only those employees who provide services to you or those who need access to your Information to service your account. In addition, we will maintain physical, electronic and procedural safeguards that meet federal standards to protect your Information. We require our employees to adhere to a Code of Ethics, which obligates them to maintain the confidentiality of all client Information.



If you have any questions or concerns about this Privacy Notice, please contact us at 617-956-6710.

This Privacy Notice applies to our current, former and potential clients and investors in our private investment vehicles for whom we have collected Information. March 2023

Legal Notices

Marble Harbor Investment Counsel, LLC (“Marble Harbor”) is an independent investment adviser organized in November 2005. The information contained on this website is intended for the use of citizens and residents of the United States only. Due to various state and foreign regulations and filing requirements, Marble Harbor and its representatives may only provide investment advisory services in those states and countries in which they are appropriately registered or otherwise exempt or excluded from registration requirements.

Marble Harbor’s web site is limited to the dissemination of general information regarding its investment advisory services to United States residents residing in states where providing such information is not prohibited by applicable law. Accordingly, the publication of our web site on the Internet should not be construed as Marble Harbor’s solicitation to effect or attempt to effect transactions in securities or the rendering of personalized investment advice or services for compensation over the Internet.

Furthermore, the information resulting from the use of tools or other information on this Internet site should not be construed, in any manner whatsoever, as the receipt of, or a substitute for, personalized individual advice from Marble Harbor. Any subsequent, direct communication by Marble Harbor with a prospective client shall be conducted by a representative that is either registered or qualifies for an exemption or exclusion from registration in the state where the prospective client resides.

Nothing on this website should be interpreted to state or imply that past results are an indication of future performance.

Email messages are not encrypted, and may be subject to interception by a third-party. For this reason, do not include any non-public personal information in any email that you send to Marble Harbor.

Links from Our Website

Marble Harbor may provide links to other websites as a convenience to visitors. Marble Harbor does not, directly or indirectly, control the entities that provide or operate those web sites, and we are not responsible for their practices (including, but not limited to, their privacy practices). Marble Harbor does not make any representations with respect to the contents of any third-party sites or any products, services or information offered on those sites.

