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PRIVACY NOTICE

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Investment Advisers are required by law to inform their clients of their policies regarding privacy of client information. We are bound by professional standards of confidentiality that are even more stringent than those required by law. Federal law gives customers the right to limit some but not all sharing of personal information. It also requires us to tell you how we collect, share, and protect your personal information.

**TYPES OF NONPUBLIC PERSONAL  
INFORMATION (“NPI”) WE COLLECT**

We collect NPI about you that is either provided to us by you or obtained by us with your authorization. This can include but is not limited to your Social Security Number, Date of Birth, Banking Information and Financial Account Numbers and/or Balances, Sources of Income, Credit Card Numbers, or other Information. When you are no longer our customer, we may continue to share your information only as described in this notice.

**PARTIES TO WHOM WE DISCLOSE  
INFORMATION**

All Investment Advisers may need to share NPI to run their everyday business. In the section below, we list the typical reasons that we may share your personal information:

- For everyday business purposes – such as to process your transactions, maintain your account(s), or respond to court orders and legal investigations, work with technology providers, compliance consultants, and counsel, or report to credit bureaus;
- Please note Text Message Opt-in's are excluded from sharing information
- For our marketing – to offer our products and services to you;
- For joint marketing with other financial companies;
- For our affiliates' everyday business purposes – information about your transactions and experiences; or

If you are a new customer we may begin sharing your information on the day you sign our agreement. When you are no longer our customer, we may continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing. However, please note we do not use NPI to give to third parties so they may market to you. **OF**

**PROTECTING THE CONFIDENTIALITY  
CURRENT AND FORMER CLIENT'S INFORMATION**

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law, including computer safeguards and secured files and building.

**PRIVACY NOTICE SUPPLEMENT: CALIFORNIA RESIDENTS**

California law requires us to disclose that you may request to be placed on our “do not call” list at any time by calling us at 617.600.0510. To obtain further information, contact The Office of the California Attorney General, P.O. Box 944255, Sacramento, CA 94244; phone (916) 210-6276.

**PRIVACY NOTICE SUPPLEMENT: CONNECTICUT RESIDENTS**

Connecticut law requires us to disclose that you may request to be placed on our “do not call” list at any time by calling us at 617.600.0510. To obtain further information, contact The Office of the Attorney General, 165 Capitol Avenue, Hartford, CT 06106; phone (860) 808-5318; email [Attorney.General@ct.gov](mailto:Attorney.General@ct.gov)

**PRIVACY NOTICE SUPPLEMENT: DELAWARE RESIDENTS**

Delaware law requires us to disclose that you may request to be placed on our “do not call” list at any time by calling us at 617.600.0510. To obtain further information, contact The Office of the Attorney General, 820 N. French St., Wilmington, DE 19801; phone (302)577-8400; email [attorney\\_general@delaware.gov](mailto:attorney_general@delaware.gov)

**PRIVACY NOTICE SUPPLEMENT: FLORIDA RESIDENTS**

Florida law requires us to disclose that you may request to be placed on our “do not call” list at any time by calling us at 617.600.0510. To obtain further information, contact The Office of the Attorney General, PL-01 The Capitol, Tallahassee, FL 32399-1050; phone (866) 966-7226.

**PRIVACY NOTICE SUPPLEMENT: NEW HAMPSHIRE RESIDENTS**

New Hampshire law requires us to disclose that you may request to be placed on our “do not call” list at any time by calling us at 617.600.0510. To obtain further information, contact The Office of the Attorney General, 1 Granite Place South Concord, NH 03301; phone (603) 271-3658.

**PRIVACY NOTICE SUPPLEMENT: NEW JERSEY RESIDENTS**

New Jersey law requires us to disclose that you may request to be placed on our “do not call” list at any time by calling us at 617.600.0510. To obtain further information, contact The Office of the Attorney General, 140 East Front Street, 6th Floor Trenton, NJ 08625-0090; phone (609) 292-4925.

#### **PRIVACY NOTICE SUPPLEMENT: VIRGINIA RESIDENTS**

Virginia law requires us to disclose that you may request to be placed on our “do not call” list at any time by calling us at 617.600.0510. To obtain further information, contact The Office of the Attorney General, 202 North Ninth Street, Richmond, VA 23219; phone (804) 786-2071.

#### **THE RIGHT TO LIMIT SHARING – OPTING OUT AND OPTING IN**

Federal law allows you the right to limit the sharing of your NPI by “opting-out” of the following: (i) sharing for affiliates’ everyday business purposes -- information about your creditworthiness; and (ii) sharing with affiliates who use your information to market to you. State laws and individual companies may give you additional rights to limit sharing. Please notify us immediately at our address or telephone number if you choose to opt out of these types of sharing.

#### **DEFINITIONS:**

**Affiliates** - companies related by common ownership or control. They can be financial and nonfinancial companies;

**Non - affiliates** – companies not related by common ownership or control. They can be financial and nonfinancial companies;

**Joint marketing** – a formal agreement between non-affiliated financial companies that together market financial products or services to you.

Massachusetts law gives its residents additional rights to limit sharing. Under Massachusetts law, we may not share NPI with non-affiliates unless we first receive written permission (“opting-in”). If we do not receive permission to share this NPI, then we are prohibited from sharing this NPI with “non- affiliates” as defined below.

**I give you permission to share my NPI with non-affiliates as described herein.**

*Signature of Client(s):* \_\_\_\_\_

*Please call if you have any questions. Your privacy, our professional ethics, and the ability to provide you with quality financial services are very important to us.*