

## Boston Advisors Privacy Policy and GDPR Data Protection Notice

### Collection, Use and Retention of Your Information

At Boston Advisors, one of our most important responsibilities to you is the safekeeping of your personal information. We limit the collection, use, retention, and transmission of your personal information to what we believe is necessary to service your account, process transactions on your behalf, respond to inquiries from your representatives, and for that which is pursuant to legal and regulatory requirements.

This Data Protection Notice ("Notice") is to inform US-based European-based clients of Boston Advisors on the collection, use, disclosure, transfer, and other processing of clients' individually identifiable information ("Personal Data").

To European-based clients of Boston Advisors, Boston Advisors hereby notifies you that it is located in the United States, the laws of which might not provide a level of data protection equivalent to you that is provided by the law in your home country. Under applicable European data privacy laws including, but not limited to, laws implementing the General Data Protection Regulation 2016/679 (GDPR) and the UK Data Protection Act (together the "Data Privacy Laws"), the Company is the data controller.

This notice applies to current and former clients for whom we have collected personal information. This notice does not apply to business or commercial customers.

### Types of Personal Data and Information Sources

**We collect and process certain Personal Data about you. We collect and process your Personal Data**

- **for purposes that are required by applicable law, regulations, agreements or other contracts,**
- **to allow the Company to fulfill its business needs and legal obligations**
- **in furtherance of business relationships with our clients.**

We may collect information about you from the following sources:

- Discussions with you – such as your name, title, address, Social Security number, birth date, assets, income, contact information and work history.
- Applications or forms you complete or information you supply to us – such as your custodian account, trust and estate documents, and other similar documents.
- Your transactions – such as account balances held with custodians, and your account usage.
- Third party representatives – such as your attorney, trust administrators, and accountants.

**Continuation of your relationship with Boston Advisors indicates your consent with our using your Personal Information to send you work related communications, including without limitation marketing communications.**

### Protection of Your Information

We maintain electronic, physical and procedural safeguards, including encryption of e-mails containing personal information and password protection of workstations. We shred documents that need to be discarded and secure physical records at the office in which we work.

### Sharing Information with Third Parties

Boston Advisors discloses personal information about our customers or former customers as permitted by US law, including Regulation S-P. We may disclose personal information that we collect to certain nonaffiliated third parties, such as service and data providers and other such parties whose products and services are necessary for our regulatory compliance and essential to day-to-day functions. Service providers and affiliates are obligated to keep personal information we share with them confidential and limit the use of such information strictly to the services that they provide to Boston Advisors.

Examples of parties with whom we share your information include:

- Third party service providers, specifically:
  - Software service providers, such as eMoney Advisors, LLC and SS&C Advent
  - Custodians and executing brokers
  - Auditors, such as financial and performance verification auditors
  - Consultants, such as those in compliance and IT
  - System and data providers, such as FactSet
- Regulators
- Affiliated parties, such as our Board of Directors and shareholders
- In the case of responding to a subpoena, court order or judicial process

#### **How You Can Help**

You can have a role in helping us by safeguarding your Information from others and by reviewing your statements promptly and notifying us if you observe suspicious activity.

#### **How to Contact Us**

If you suspect that someone has gained unauthorized access to your information through Boston Advisors or believe that your account information is inaccurate in any way, please contact us immediately at **617-348-3100**.