

## **Our Commitment To You**

As a Winslow Management Company client, you have entrusted to us your assets and your personal and financial data. We recognize that your relationship with us is based on trust, and that you expect us to act responsibly and in your best interest. Because your personal and financial information is private, we hold ourselves to the highest standards in its safekeeping and use.

We may collect nonpublic personal information about you from the following sources:

- Information we receive from you on account applications or other forms, such as your name, address, telephone number, social security number, income, assets, and investment objectives
- Information about your transactions with us, our affiliates, or others, such as your account numbers and balances, investment activity, and other transaction information
- Information from employers that administer employee benefits programs through us

## **We Protect Your Personal Information**

We have adopted policies and procedures that are reasonably designed to ensure the security and confidentiality of customer information which includes consumer report information. In addition, these policies and procedures are designed to prevent unauthorized access to or use of customer records or information that could result in substantial harm or inconvenience to any customer.

We use the information described above when administering your account. We may disclose nonpublic personal information in order to provide a service or complete a transaction that you request or authorize, or as otherwise required or permitted by the laws and industry standards that apply to us (i.e. anti-money laundering, regulatory requests). We may also disclose nonpublic personal information to service providers we have contracted with in order to inform you of other financial products and services that we offer and to properly service your account.

We restrict access to nonpublic personal information about you to our employees who need to access the information to provide products and services to you. We maintain physical, electronic and procedural safeguards to protect your nonpublic personal information. Confidential customer information is destroyed or shredded prior to disposal.

Our privacy policies and procedures will continue to apply to your information even if your account is no longer active.

## **What You Can Do**

For your protection, we recommend that you do not provide your account information to anyone. If you become aware of any suspicious activity relating to your account, please contact us immediately.

## **We Will Keep You Informed**

You might receive notices of changes to our privacy policies and procedures or periodic updates of this notice, as required by law.

At Winslow Management Company, we are proud of the trust and confidence we have earned from you. We will continue to earn that trust and confidence by keeping your nonpublic personal information secure and confidential.

**Amended January 2, 2006**