

IMPORTANT INFORMATION ABOUT PRIVACY AND INFORMATION SHARING

In compliance with federal, state, and other regulations as applicable, GW&K maintains policies and procedures designed to protect the non-public, financial, personal, or otherwise sensitive information of its clients. Keeping this information confidential and secure is a top priority. The following guidelines are designed to help clients understand how GW&K gathers, uses, and protects this information.

GW&K collects and maintains non-public, financial, personal, or otherwise sensitive information to facilitate investment management services provided to its clients. The types and sources of information collected include:

- Information obtained from agreements, applications, account opening forms, questionnaires, or other documents and correspondence such as name, address, phone number, assets, and income;
- Information we generate, such as portfolio appraisals and trade tickets; and
- Information provided to us by authorized parties acting on behalf of our clients such as accountants, attorneys, or investment consultants.

GW&K does not disclose non-public, financial, personal, or otherwise sensitive information about current, prospective or former clients, except as required and permitted by law. The types of information GW&K may share include:

- Information to companies necessary to service client accounts, such as providing account and trade information to brokers and custodians;
- Information generated by GW&K, such as portfolio appraisals, to authorized persons;
- Information necessary for non-affiliated companies, including third party service providers such as accounting firms, to perform services for GW&K and its clients; and
- Data provided to certain affiliates, who use the information only for internal reporting, record-keeping, and other legitimate business purposes.

GW&K maintains firm-wide physical, electronic, and procedural safeguards designed to comply with federal, state, and other applicable standards to protect its client's information.

- Access to electronic client information is limited by electronic safeguards, such as passwords for access to our networks, data and programs;
- Records are kept in GW&K's office or stored by a records management firm;
- Third parties which work on GW&K's clients' behalf are specifically instructed that client information must remain confidential; and
- All safeguards apply to nonpublic personal information of current and former clients.

For questions concerning our Privacy Policy, please contact the Compliance Department at 617-236-8900, or write to:

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