

GW&K Investment Management, LLC

IMPORTANT INFORMATION ABOUT PRIVACY & INFORMATION SHARING

In compliance with federal, state and international regulations, GW&K Investment Management, LLC (“GW&K” or “we” or “our”) 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 sell client information. GW&K does not disclose non-public, financial, personal, or otherwise sensitive information about current, prospective or former clients, except as required in connection with our performance of investment management services provided to its clients and permitted by applicable federal, state and international laws. The type of information GW&K may share includes:

- Information to entities necessary to service client accounts, such as providing account and trade information to broker/dealers 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, international and other applicable standards to protect its clients’ information from unauthorized disclosure, including the following:

- 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 which are secured by physical security and controlled via electronic identification card readers at entry points;
- Third parties which work on GW&K’s clients’ behalf are specifically instructed that client information must remain confidential; and
- All safeguards apply to non-public personal information of current and former clients.

For questions concerning our Privacy Policy, please contact GW&K’s Legal & Compliance Department at 617-236-8900, or write to: Legal & Compliance Department, GW&K Investment Management, 222 Berkeley Street, 15th Floor, Boston, MA 02116