

BOSTON COMMON ASSET MANAGEMENT, LLC

Notice of Privacy Policy & Practices

Boston Common Asset Management, LLC (“BCAM”) recognizes and respects the privacy expectations of our clients.¹ We provide this notice to you so that you will know what kind of information we collect about our clients and the circumstances in which that information may need to be disclosed to third parties who are not affiliated with BCAM.

Collection of Client Information

We collect non-public personal information about our clients directly from our clients. This information includes names, birthdates, social security numbers, addresses, phone numbers and pertinent financial information. We collect this information in order to properly execute financial transactions on clients’ behalf. This information is provided and collected in various ways and may include the following documentation:

- Investment Agreements, Subscription Agreements, Client Questionnaires and other forms that include client information such as:
- Account History;
- Transaction History;
- Correspondence, either physical or electronic; and
- Identification information, including driver’s licenses and passports.

Disclosure of Client Information

We may share the information you provide, as described above, with an affiliated entity in order to service your account or to provide you with information about other products and services that may further your investment strategy.

In addition, we may disclose all of the information we collect to third parties who are not affiliated with BCAM under one or more of the following circumstances:

- As authorized by you, the client;

¹ For purposes of this notice, the term “client” includes both (i) individuals who have a continuing advisory relationship with BCAM (*e.g.*, by having an account managed or advised by BCAM) and (ii) individuals who provide nonpublic personal information to BCAM, but who do not have a continuing relationship with BCAM (*e.g.*, an individual who provides such information in deciding whether to become an advisory client of BCAM, whether or not the individual establishes a continuing advisory relationship with BCAM).

- As required by law in response to regulatory inquiries or court subpoenas.
- As permitted by law. For example, we will share information with companies that maintain, process or service client accounts or financial products, and with companies that service, effect, administer or enforce client transactions in conjunction with, or on behalf of, BCAM. Sharing information for these purposes is essential to providing clients with necessary or useful services with respect to their accounts.
- Under joint agreements. We may also share information with companies that perform marketing services on our behalf or to other financial institutions with which we have joint marketing agreements.

Security of Client Information

BCAM will:

- Maintain policies and procedures designed to assure only appropriate access to information about clients of BCAM;
- Limit the use of information about BCAM's clients to the purposes for which the information was disclosed or as otherwise permitted by law; and
- Maintain physical, electronic and procedural safeguards that comply with federal and state regulations to guard nonpublic personal information about BCAM's clients.

BCAM limits the information provided to third-party service providers to only what is necessary to process transactions and perform other services related to client accounts.

Former Clients of BCAM

We will adhere to the policies and practices described in this notice regardless of whether you are a current or former client of BCAM.

IMPORTANT INFORMATION FOR CALIFORNIA AND VERMONT CLIENTS

Your Rights

You have the following rights to restrict BCAM from sharing personal and financial information with any BCAM affiliates (companies we own or control) or outside companies with which we do business. Nothing in this form prohibits us from sharing information necessary for us to follow the law, as permitted by law, or to give you the best service on your accounts with us. This may include sending you information about some products and services.

Your Choices

1. **You May Restrict Information with Companies We Own or Control (Affiliates).**

Unless you say “No” where indicated below, we may share personal and financial information about you with our affiliated companies.

- NO, please do not share personal and financial information with your affiliated companies.

2. **You May Restrict Information We Share with Other Companies We Do Business with to Provide Financial Products and Services.**

Unless you say “No,” we may share personal and financial information about you with outside companies we contract with to provide financial products and services to you.

- NO, please do not share personal and financial information with outside companies you contract with to provide financial products and services.

Time Sensitive Reply

You may make your privacy choices at any time. Your choices marked here will remain in effect unless you state otherwise. However, if we do not hear from you we may share some of your information with affiliated companies and other companies with

which we have contracts to provide products and services.

To exercise your choice, you may do one of the following:

1. Fill out, sign and send this form back to us;
2. Email us at: lcompere@bostoncommonasset.com;
3. Call us collect at 617-720-5557, and ask to speak with Lauren Compere.

Name: _____

Account Name or Number: _____

Signature _____

Date: _____

** * * * *

If you have questions regarding these policies, please contact us by writing to Boston Common Asset Management, LLC, 84 State Street, Boston, MA 02109, Attention: Lauren Compere, or by calling (617) 720-5557.