

BOSTON COMMON ASSET MANAGEMENT, LLC

Notice of Privacy Policy & Practices

Boston Common Asset Management, LLC (“Boston Common” or “BCAM”) recognizes and respects the privacy expectations of its clients.¹ We provide this notice to you so 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 Boston Common. Boston Common does not sell clients’ personal information to anyone.

What client information does Boston Common collect?

In order to provide services to our clients, we collect non-public personal information from them. This includes information such as names, birthdates, social security numbers and pertinent financial information. We collect this personal information in documents such as investment management agreements, client questionnaires and account statements. We retain this information in hard copy or electronically.

Why does Boston Common collect client information?

All financial companies need to share clients’ personal information to run their everyday businesses. We collect information from you in order to service and manage your account. We also collect this information to offer our products and services to you.

Disclosure of Client Information

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

- As authorized by you, the client;
- As required by law in response to regulatory inquiries or court subpoenas; and
- As permitted by law. For example, we will share information with brokers, dealers, distributors, administrators and custodians to the extent necessary to service your account. Sharing your information with parties like these is essential to managing your account.

Security of Client Information

To maintain the confidentiality of its clients’ personal information, Boston Common will:

- maintain policies and procedures designed to assure that access to information

¹ For purposes of this Notice, the term “client” includes both (i) individuals who have a continuing advisory relationship with Boston Common (e.g., by having an account managed or advised by Boston Common), and (ii) individuals who provide non-public personal information to Boston Common but who do not have a continuing relationship with the firm (this might include, for example, an individual who provides such information in deciding whether to become an advisory client of Boston Common).

about clients is appropriately limited;

- limit the use of information about Boston Common’s clients to the purposes for which the information was disclosed (such as servicing a client account) 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.

When Boston Common shares your personal information with third parties, these third parties are not permitted to use the information for any purpose other than servicing your account or as otherwise permitted by law or regulation.

If you close your account, or if we have no contact with you, Boston Common will continue to share your personal information according to the terms of this notice.

For Vermont Residents Only – The State of Vermont has stricter standards than federal guidelines concerning when a client’s non-public personal information is permitted to be shared. Boston Common does not currently have any joint marketing agreements with affiliates or third parties in which we share clients’ non-public personal information. Boston Common does not have separate departments that might offer financial products or services. Boston Common will not share non-public personal information with either affiliates or third parties in the future, except as permitted by law to service your account, without your consent. Vermont residents do not have to complete an opt-out form to implement this privacy policy.

For California Residents Only – The State of California has stricter standards than federal guidelines concerning when a client’s non-public personal information is permitted to be shared. If you live in California, Boston Common will not disclose non-public personal information about you to non-affiliated third parties, except as described above in “Disclosure of Client Information”, or if you “opt-in” on a form that Boston Common will send you before making any such disclosure. Also, unless you “opt in,” Boston Common will not disclose non-public personal information about you to companies that perform marketing services on our behalf or to other financial institutions with which Boston Common has joint marketing agreements. California residents do not have to complete an opt-out form to implement this privacy policy.

If you have questions regarding this Notice, please contact us by writing to Boston Common Asset Management, LLC, 200 State Street, 7th Floor, Boston, MA 02109, Attention: Compliance, by email at compliance@bostoncommonasset.com or by telephone at (617) 720-5557.