

GANNETT WELSH & KOTLER, LLC

IMPORTANT INFORMATION ABOUT PRIVACY AND CERTAIN INFORMATION SHARING

In compliance with Securities and Exchange Commission regulations, we are pleased to provide you with our privacy policy. At Gannett Welsh & Kotler, LLC (“GW&K”) we appreciate the trust our clients place in us and we recognize the importance of protecting the confidentiality of non-public personal information that we collect about them. Keeping this information confidential and secure is a top priority. The following guidelines are designed to help you understand how we gather, use, and protect your personal and financial information.

GW&K collects and maintains non-public personal information to enable us to provide investment management services to our clients. The types and sources of information that we collect include:

- Information obtained from agreements, applications, account opening forms, questionnaires, or other documents and correspondence such as name, address, phone number, social security number, assets, income, investment objectives and risk tolerance;
- Clients' transactions and holdings with us, our affiliates, and others. For example, in connection with servicing you, we may obtain from a broker, custodian or consultant information such as financial statements, trade confirmation, positions, and balances; and
- Information provided to us by authorized parties acting on behalf of our clients such as accountants, attorneys, or investment consultants.

We do not disclose non-public personal information about our current, prospective or former clients, except as required or permitted by law. The types of information that may be shared include:

- Information to companies that is necessary in order to service client accounts, such as providing account and trade information to brokers and custodians;
- Information that we generate, such as account appraisals, to authorized persons;
- Information that is 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 that we provide to certain affiliates, who use the information only for internal reporting, record-keeping, and other legitimate business purposes.

We maintain firm-wide physical, electronic, and procedural safeguards designed to comply with federal standards to protect our clients' non-public personal 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 that is covered by a confidentiality agreement;
- Third parties who do work on our 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:

Gannett Welsh & Kotler, LLC
222 Berkeley Street, 15th Floor
Boston, MA 02116