

# BOSTON COMMON ASSET MANAGEMENT, LLC

## *Notice of Privacy Policy & Practices*

Boston Common Asset Management, LLC recognizes and respects the privacy expectations of its clients.<sup>1</sup> 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 about clients is appropriately limited;

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<sup>1</sup> 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 nonpublic 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).

- 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.

If you have questions regarding this Notice, please contact us by writing to Boston Common Asset Management, LLC, 84 State Street, Boston, MA 02109, Attention: Dory Bowers, or by calling us collect at (617) 720-5557.

**IMPORTANT INFORMATION FOR CALIFORNIA AND  
VERMONT CLIENTS**

**Your Right to Opt-Out**

You have the right to restrict Boston Common from sharing personal and financial information with outside companies with which Boston Common conducts business. *Nothing in this form prohibits us from sharing information that is necessary for us to follow the law, as permitted by law, or to give you the best service on your accounts with us.*

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.

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

1. Email us at: [dbowers@bostoncommonasset.com](mailto:dbowers@bostoncommonasset.com)
2. Call us collect at 617-720-5557, and ask to speak with Dory Bowers
3. Sign and date the form below and send it to us at Boston Common Asset Management, 84 State Street, Suite 940, Boston, Massachusetts 02109, attention Dory Bowers

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

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

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