

PRIVACY NOTICE

Anchor Capital Advisors, LLC, (The Company, Anchor), has policies and procedures in place to safeguard the personal information of its current and former clients and their families, businesses or other entities. The Privacy policies were adopted to comply with SEC Federal Regulations S-P and S-AM and the Commonwealth of MA regulation 201 CMR 17:00. Below we explain how The Company collects, uses, retains, discloses and secures personal information.

Information We Gather

Since the mission of The Company is to provide clients with investment advice, we collect and store or archive detailed information about our clients. The types of information we collect may include, but are not limited to, names, addresses, phone numbers, social security numbers of family members, detailed personal financial information including income, tax status and history, detailed net worth data, asset lists and valuations, insurance and estate planning documents, and a wealth of other personal and family data. This information is derived from the following sources:

- Client information forms, portfolio appraisals, financial account statements, gain/loss ledgers, income tax returns, personal financial records, financial planning documents, estate planning and personal checking/brokerage/bank/ retirement plan/stock option plan statements provided to us by you or your trusted advisors.
- Interviews with clients and family members or a management team, interviews or discussions with various trusted advisors including, but not limited to, tax preparation professionals, attorneys, financial planners, insurance advisors, estate planning professionals, brokers or other trusted advisors.
- Information about transactions which are executed on behalf of clients.
- Information received from clients, family or trusted advisors in written, telephonic or electronic form.

Protection of Your Information

Anchor protects clients' personal information by maintaining physical, electronic and procedural safeguards that meet or exceed applicable laws. We do not sell, share or divulge confidential information pertaining to our clients to any unaffiliated third party except as outlined in the categories below. We do not share client information for marketing purposes.

Disclosure of Information Required to Conduct Business on Your Behalf

In the normal course of conducting business your information may be aggregated with that of other clients as a result of block trading, data downloads, or other processing procedures. We may share or disclose this information to organizations including custodial establishments, brokerage firms, clearing agents and proxy and class action administrators. All of these organizations have their own privacy and customer confidentiality obligations and policies, and many are subject to The SEC's Regulation S-P and/or the privacy requirements of their governing body. In the event we are requested to share client information with a party with whom we do not have a relationship, we will request written or electronic authorization before the information is released.

Disclosure of Information to Legally Empowered Regulatory Entities

Anchor Capital Advisors, LLC is subject to registration requirements with The Securities and Exchange Commission and state regulatory authorities for essentially all 50 states. Both Federal and State authorities are empowered to perform certain audit functions to ensure our companies comply with federal, state and local laws governing Registered Investment Advisory Firms. In the course of performing such audit functions, these regulatory authorities may request data and information regarding our clients. We will take all possible steps to ensure this information will be protected and not removed from our premises

nor recorded in any form where it might become subject to public disclosure under applicable state and federal laws. We could also be required to provide information about clients without their consent, as permitted by law, to respond to a subpoena or court order or in connection with proposed or actual sale, merger or transfer of ownership of our businesses.

Disclosure of Information to Facilitate Electronic Communication

Anchor may share clients' contact information with third-party vendors to facilitate electronic communication, such as emails and/or electronic delivery of company information. Anchor has also contracted with a vendor to provide a secure portal where clients may upload and download documents. These vendors have their own privacy policies and are subject to Anchor's Vendor Management Policy.

Revised: June, 2013, December 2017, April 2023

Reviewed August 2014, July 2015, January 2016, January 2017, October 2018, January 2019, January 2020, January 2021, January 2022, January 2023