

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.

Our Customer Privacy Policy

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 our business acting as a fiduciary on behalf of our clients, we must share or disclose some data about our clients to organizations including custodial establishments, brokerage firms who may be selected to execute transactions on behalf of our clients, clearing agent firms and law firms pursuing shareholder class action lawsuits. All of these organizations have their own privacy and customer confidentiality obligations and policies, and many are subject to Regulations S-P and S-AM.

Disclosure of Information with Your Consent

In the normal course of our business, company associates are frequently requested by clients to provide confidential client information including, but not limited to, gain/loss ledgers, portfolio appraisals, asset cost basis and market value data etc. to accountants, lawyers, financial planners/advisors or brokers. Clients must provide written or electronic authorization before the information will be 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 sign up to log in and view and/or download account information. These vendors have their own privacy policies and are subject to Anchor's Vendor Management Policy.

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