

## “The Anchor Companies Privacy Notice”

As required by the Gramm-Leach-Bliley Act, signed into law in November 1999, Anchor Capital Advisors LLC, Anchor/Russell Capital Advisors LLC and Anchor Venture Trust (hereinafter “**The Anchor Companies**”) have adopted policies in order to safeguard the personal information of The Anchor Companies’ respective clients and their families, businesses or other entities; all of the following also applies to former clients. This policy was adopted to comply with **Regulation S-P** as effected by the Securities and Exchange Commission.

The Anchor Companies’ relationship with their customers is uniquely personal. We help our clients with important financial matters relating to investment management of private wealth. As our client, you entrust us with detailed personal information regarding yourself, your family, your investments, your business, your lifestyle, your estate planning and financial planning. Keeping confidential client information secure is a top priority. As required by MA regulation 201 CMR 17:00 Standards for the Protection of Personal Information of Residents of the Commonwealth, effective as of March 1, 2010, the Anchor Companies have taken further steps in order to be compliant with this new state regulation. This Privacy Notice explains the Anchor Companies collection, use, retention, disclosure and security of information about you and your family.

### **How We Gather Information**

Since the mission of The Anchor Companies is providing our customers with investment advice, we necessarily collect and store or archive detailed information about our customers. The types of information we necessarily collect 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 to assist us in understanding your investment needs, risk tolerance, long term objectives and overall financial situation; our analysis of this information, which is generally quite specific and detailed, is necessary to develop a suitable investment management program.
- Interviews with you and members of your family or management team, interviews or discussions with various trusted advisors including, but not limited to, your tax preparation professional, attorney, financial planner, insurance advisor, estate planning professional, broker or other trusted advisors.
- Information about transactions which we execute on your behalf.
- Information received from you, your family or your trusted advisors in written, telephonic or electronic form.

## Our Customer Privacy Policy

The Anchor Companies serve as fiduciaries for our investment management clients, and we protect personal information by maintaining physical, electronic and procedural safeguards that meet or exceed applicable law. We will not sell, share or divulge confidential information pertaining to our clients to any unaffiliated third party except as outlined in the three categories below. We do disclose, as permitted by law, certain of the information described above for the purposes outlined below.

### **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 necessarily share or disclose some data about our clients to custodial organizations (who usually also possess detailed personal information about you as their client), 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 Regulation S-P. In most cases these are large, national organizations who have sophisticated and disciplined compliance procedures. It is important for you to understand that we would not be able to conduct business on your behalf without disclosing certain limited information regarding you and your account to these unaffiliated third parties.

### **Disclosure of Information With Your Consent**

In the normal course of our business, company associates are frequently requested by customers 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. We are happy to comply with such client requests, however we must request that clients provide written or electronic confirmation of such requests in order to ensure the release of this confidential data does not violate the spirit or letter of Regulation S-P.

### **Disclosure of Information To Legally Empowered Regulatory Entities**

The Anchor Companies are 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 is 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 you without your 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.

As always, should you have any questions, comments or observations, please do not hesitate to contact us.