

## PRIVACY NOTICE

### **GUIDING PRINCIPLES:**

The relationship between Longfellow Investment Management Co., LLC (“LIM”) and our clients is the most important asset of our Firm. We strive to maintain your trust and confidence in our Firm, an essential aspect of which is our commitment to protect your personal information to the best of our ability. We believe that all our clients value their privacy, thus we will not disclose your personal information to anyone unless required by law, at your direction, or if necessary to provide our services. We have not and will not sell your personal information to anyone.

### **THE PERSONAL INFORMATION THAT WE COLLECT, MAINTAIN, AND COMMUNICATE:**

LIM collects and maintains your personal information to provide investment management services to you. The types of information we collect and maintain about you includes, but is not limited to the following:

- Information we receive from you to open an account or provide investment advice to you (e.g., account number, address, telephone number, financial information, authorized signers information);
- Information that we generate to service your account (e.g., trade tickets and account statements); and
- Information that we may receive from third parties with respect to your account (e.g., trade confirmations from brokerage firms).

To provide investment management services to you, we may use / disclose your personal information in very limited circumstances (subject to requirements under applicable local laws), which include:

- Disclosures to companies—subject to confidentiality agreements—that perform services on our behalf (e.g., technology consultants who assist us in maintaining our computer systems); and
- Disclosures to companies as permitted by law, including those necessary to service your account (e.g., providing account information to brokers dealers, counterparties and custodians).

### **HOW WE PROTECT YOUR PERSONAL INFORMATION:**

To fulfill our privacy commitment at LIM, we have instituted firm-wide practices to safeguard your information. These include:

- Adopting policies and procedures that will safeguard your personal information;
- Limiting access of personal information to those employees who need it to perform their job responsibilities;
- Protecting against any anticipated threats, unauthorized access, or hazards to the security of client records and information; and
- Protecting former clients’ information to the same extent as current clients.

### **DISCLOSURE TO AFFILIATES AND THIRD PARTIES:**

- LIM does not maintain independent operating entities, thus LIM does not allow affiliates to utilize eligibility information to solicit clients for marketing purposes.
- LIM does not disclose client information to non-affiliated third parties without a specific client request or without obtaining prior permission from a client. For instance, one circumstance where LIM may ask permission to disclose limited client information to a third party is for a client reference.

*This privacy notice (“Notice”) is effective March 1, 2023. Notice replaces all previous statements of our client privacy policy and may be amended at any time. LIM will keep you informed of changes as required by law. All questions regarding this Notice may be addressed to the Chief Compliance Officer at 617-695-3504.*