

FACTS	WHAT DOES VESTMARK ADVISORY SOLUTIONS, INC. (“VAS”) DO WITH YOUR PERSONAL INFORMATION?
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Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
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What?	<p>The types of personal information we collect and share depends on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> ▪ Social Security number ▪ Income ▪ Assets ▪ Risk tolerance ▪ Transaction history ▪ Account Balances
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How?	All financial companies need to share customers’ personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers’ personal information; the reasons VAS chooses to share; and whether you can limit this sharing.
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Reasons we can share your personal information	Does VAS share?	Can you limit this sharing?
For our everyday business purposes – such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes – to offer our products and services to you	Yes	No
For joint marketing with other financial companies	No	Not Applicable
For our Affiliates’ everyday business purposes – information about your transactions and experiences	No	Not Applicable
For our Affiliates’ everyday business purposes – information about your creditworthiness	No	Not Applicable
For our Affiliates to market to you	Yes	Yes
For Nonaffiliates to market to you	No	Not Applicable

To limit our sharing?	<ul style="list-style-type: none"> • Call (888) 355-0477 • https://www.vestmark.com/privacy-policy • Mail the form below <p>Please note: If you are a new customer, we can begin sharing your information thirty (30) days from the date we sent this notice. When you are no longer our customer, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.</p>
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Vestmark Advisory Solutions, Inc.

Questions?	Call (888) 355-0477
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Who we are

Who is providing this notice?	Vestmark Advisory Solutions, Inc.
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What we do

How does VAS protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
How does VAS collect my personal information?	<p>We collect your personal information, for example, when you:</p> <ul style="list-style-type: none">▪ Submit an application or contract request forms▪ Access our services (through cookies and other tracking information)▪ Enter into an investment advisory contract▪ Communicate with our Support team▪ Intentionally share such personal information or other data through responses to support inquiries <p>We also collect your personal information from other companies.</p>
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only:</p> <ul style="list-style-type: none">• sharing for affiliates' everyday business purposes-information about your creditworthiness• affiliates from using your information to market to you• sharing for nonaffiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.</p>

Definitions

Affiliates	Companies related by common ownership and control. They can be financial and nonfinancial companies. <ul style="list-style-type: none">▪ Vestmark, Inc.▪ Vestmark Technology Solutions, Inc.▪ Vestmark Outsourcing Solutions, Inc.
Nonaffiliates	Companies not related by common ownership and control. They can be financial or nonfinancial companies. <ul style="list-style-type: none">▪ VAS does not share with nonaffiliates so they can market to you.
Joint marketing	A formal agreement between nonaffiliated financial companies that together market financial products or service to you. <ul style="list-style-type: none">▪ VAS does not jointly market.

Other important information

California and Vermont residents: For accounts with a California or Vermont mailing address, we are required to obtain your affirmative consent to share your personal information with nonaffiliates who do

Vestmark Advisory Solutions, Inc.

not currently assist us in servicing your account or conducting our business, unless otherwise required or permitted by law. For accounts with a California mailing address, we will not share your personal information with a financial company for joint marketing purposes, except as required or permitted by law.

Mail-in Form

Leave Blank OR

[If you have a joint account, your choice(s) will apply to everyone on your account unless you mark below.

Apply my choices only to me]

Mark any/all you want to limit:

- Do not share information about my creditworthiness with your affiliates for their everyday business purposes.
- Do not allow your affiliates to use my personal information to market to me.
- Do not share my personal information with nonaffiliates to market their products and services to me.

Name:

Address:

City, State, Zip:

Account #:

Mail to:

Vestmark Advisory Solutions, Inc.

c/o Vestmark, Inc.

100 Quannapowitt Parkway, Suite 205

Wakefield, MA 01880

Attn: Data Protection Officer