

Last Updated: December 22, 2020

PRIVACY NOTICE

This notice (the “Privacy Notice”) applies to information Boston Financial Investment Management, LP (collectively, “Boston Financial” “we,” “us” or “our”) collect through the www.bfim.com website (the “Website”), our social media pages that we control from which you are accessing this Privacy Policy (collectively, “Social Media Pages”), HTML-formatted email messages that we send to you that link to this Privacy Policy or other communications with you and offline business interactions you have with us. Collectively, we refer to the Website, Social Media Pages, emails and offline business interactions as the “Services.” This Privacy Notice explains what information Boston Financial collects about you through the Services, how we’ll use that information, who we’ll share it with, and what steps we’ll take to help keep it private and secure. Some of the links on the Services may lead to third party websites with their own privacy notices, which may be different than this Privacy Notice, and you should read those notices carefully.

1. INFORMATION WE COLLECT,

1.1 This Privacy Notice is concerned with personal information we collect about you. Personal information means any data by which you as an individual can be directly or indirectly (e.g., if several pieces of data are combined) identified.

1.2 Some of the personal information we hold about you will have been supplied by yourself. Other personal information may come from your employer, other members of the Boston Financial group, or other sources from which you’ve asked us to obtain information. We might also get some of it from publicly available sources.

1.3 In relation to the Services, the personal information we collect may include, without limitation:

- (a) personal details (e.g., name, occupation, date of birth, social security number);
- (b) contact details (e.g., address, email address, position in company, company, landline and mobile numbers);
- (c) IP address (we may also derive your approximate location from your IP address);
- (d) wire transfer instructions or bank account information;
- (e) other information about you which you may have provided to us during the course of our relationship with you; e.g., by filling out Website forms or commenting on the Social Media Pages; and
- (f) sales and marketing information (e.g., offers you have received from us and how you reacted to them).

1.4 If we have an existing relationship with you, and we are able to identify you from information obtained or provided by your use of the Website, we may associate those sets of information, for example, to enable us to respond to a query you have submitted.

1.5 Please note that the Website is not designed or intended for children and we do not knowingly collect data relating to children.

2. HOW WE WILL USE PERSONAL INFORMATION

2.1 The purposes for which we use your information commonly include, without limitation:

- (a) to make offers and promotions to you;
- (b) to communicate with you, including to respond to your queries (for example, if you've asked a question via the Website);
- (c) to undertake data analytics to better understand our investors' motivations and strategies and as a result improve or adjust strategy and performance of Boston Financial;
- (d) to protect our legal rights and complying with our legal obligations, including combatting financial crime;
- (e) to conduct marketing and market research;
- (f) to aggregate and/or anonymize personal information; aggregated or anonymized information will no longer be considered personal information and we may use and disclose such data for any purpose as it no longer identifies you or any other individual;
- (g) to conduct risk management; and/or
- (h) detect and prevent misuse or abuse of the Website.

3. OTHER INFORMATION COLLECTED

3.1 "Other Information" is any information that does not reveal your specific identity or does not directly relate to an identifiable individual, such as browser and device information, information collected through cookies, pixel tags and other technologies, and demographic information and other information you provide that does not reveal your specific identity. We may use and disclose Other Information for any purpose, except where we are required to do otherwise under applicable law. If we are required to treat Other Information as personal information under applicable law, we may use and disclose it for the purposes for which we use and disclose personal information as detailed in this Privacy Notice. If we combine Other Information with personal information, we will treat the combined data as personal information.

3.2 Your browser or device. Certain information is collected by most browsers or automatically through your device, such as your Media Access Control (MAC) address, computer type (Windows or Mac), screen resolution, operating system name and version, device manufacturer and model, language, Internet browser type and version and the name and version of the Services you are using. We use this information to ensure that the Services function properly.

3.3 Cookies and similar tracking technologies.

(a) Cookies. Cookies are pieces of information stored directly on the computer that you are using. Cookies allow us to collect information such as browser type, time spent on the Services, pages visited, language preferences, and other traffic data. We and our service providers use the information for security purposes, to facilitate navigation, to display information more effectively, and to personalize your experience. We also gather statistical information about use of the Services in order to continually improve their design and functionality, understand how they are used, and assist us with resolving questions regarding them. Cookies further allow us to select which of our advertisements or offers are most likely to appeal to you and display them while you are on the Services. We may also use cookies or other technologies in online advertising to track responses to our ads. We do not currently respond to browser do-not-track signals. If you do not want information collected through the use of cookies, most browsers allow you to automatically decline cookies or be given the choice of declining or accepting a particular cookie (or cookies) from a particular website. You may also wish to refer to <http://www.allaboutcookies.org/manage-cookies/index.html>. If, however, you do not accept cookies, you may experience some inconvenience in your use of the Services. You also may not receive advertising or other offers from us that are relevant to your interests and needs.

(b) Pixel tags and other similar technologies. Pixel tags (also known as web beacons and clear GIFs) may be used to, among other things, track the actions of users of the Services (including email recipients), measure the success of our marketing campaigns, and compile statistics about usage of the Services and response rates.

(c) Analytics. We may use Google Analytics, which uses cookies and similar technologies to collect and analyze information about use of the Services and report on activities and trends. This service may also collect information regarding the use of other websites, apps and online resources. You can learn about Google's practices by going to www.google.com/policies/privacy/partners/, and exercise the opt-out provided by Google by downloading the Google Analytics opt-out browser add-on, available at <https://tools.google.com/dlpage/gaoptout>.

4. THIRD PARTY SERVICES AND ADVERTISING

4.1 This Privacy Notice does not address, and we are not responsible for, the privacy, information, or other practices of any third parties, including any third party operating any website or service to which the Services link. The inclusion of a link on the Services does not imply endorsement of the linked site or service by us or by our affiliates.

4.2 In addition, we are not responsible for the information collection, use, disclosure, or security policies or practices of other organizations, such as Facebook, Apple, Google, Microsoft, RIM, or any other app developer, app provider, social media platform provider, operating system provider, wireless service provider, or device manufacturer, including with respect to any personal information you disclose to other organizations through or in connection with the Social Media Pages.

4.3 We use third-party advertising companies to provide advertisements regarding goods and services that may be of interest to you when you access and use the Services and other websites or online services. You may receive advertisements based on information relating to your access to and use of the Services and other websites or online services on any of your devices, as well as on information received from third parties. These companies place or recognize a unique cookie on your browser (including through the use of pixel tags). They also use these technologies, along with information they collect about your online use, to recognize you across the devices you use, such as a mobile phone and a laptop. If you would like more information about this practice, and to learn how to opt out of it in desktop and mobile browsers on the particular device on which you are accessing this Privacy Notice, please visit <http://optout.aboutads.info/#/> and <http://optout.networkadvertising.org/#/>.

5. WHO WE MIGHT SHARE YOUR PERSONAL INFORMATION WITH

5.1 We may share relevant personal information of yours with other parties where it is lawful to do so. We may share your personal information with:

- (a) Our affiliates for the purposes described in this Privacy Notice;
- (b) Our third party service providers, to facilitate services they provide to us. These can include providers of services such as website hosting, data analysis, payment processing, order fulfilment, information technology and related infrastructure provision, customer service, email delivery, auditing, and other services;
- (c) any people or companies in connection with potential or actual corporate restructuring, merger, acquisition or takeover, including any transfer or potential transfer, or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings);
- (d) law enforcement, government, courts, dispute resolution bodies, our regulators and auditors to respond to a request or to provide information we believe is necessary or appropriate;
- (e) other parties for other legal reasons, including to enforce our terms and conditions; and to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others; and
- (f) anybody else with whom you instructed or permitted us to share your information.

5.2 By using the Services, you may elect to disclose personal information on message boards, chat, profile pages, blogs, and other services to which you are able to post information and content (including, without limitation, our Social Media Pages). Please note that any information you post or disclose through these Services will become public and may be available to other users and the general public.

6. JURISDICTION AND CROSS-BORDER TRANSFERS OF PERSONAL INFORMATION

6.1 Your personal information may be stored and processed in any country where we have facilities or in which we engage service providers, and by using the Services you understand that your information may be transferred to

countries outside of your country of residence, including the United States, which may have data protection rules that are different from those of your country. In certain circumstances, courts, law enforcement agencies, regulatory agencies or security authorities in those other countries may be entitled to access your personal information.

7. CHOICES AND ACCESS

7.1 We give you choices regarding our use and disclosure of your personal information for marketing purposes. You may opt out from receiving marketing-related emails from us. If you no longer want to receive marketing related emails from us on a going-forward basis, you may opt out by following the unsubscribe instructions in each marketing-related email. We will try to comply with your request(s) as soon as reasonably practicable. Please note that if you opt out of receiving marketing-related emails from us, we may still send you important administrative messages, from which you cannot opt out.

7.2 If you would like to request to access, correct or delete personal information (to the extent these rights are provided to you by applicable law), you may contact us in accordance with the “Contact Us” section below. We will respond to your request consistent with applicable law. In your request, please make clear what personal information you would like to have changed. For your protection, we may only implement requests with respect to the personal information associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request.

Please note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions that you began prior to requesting a change or deletion (e.g., once entered into a transaction or promotion, you may not be able to change or delete the Personal Information provided until after the completion of such transaction or promotion).

8. MISCELLANEOUS

8.1 Please ensure that any data you give us or ask third parties to provide to us is up-to-date, accurate and complete in all respects. Please inform us about any changes as soon as reasonably possible.

8.2 We seek to use reasonable organizational, technical and administrative measures to protect personal information within our organization, which may include encryption and other forms of security. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us in accordance with the “Contact Us” section below.

9. UPDATES TO THIS PRIVACY NOTICE

The “Last Updated” legend at the top of this Privacy Notice indicates when this Privacy Notice was last revised. Any changes will become effective when we post the revised Privacy Notice on the Services.

10. CONTACT US

For any further questions or queries in relation to this Privacy Notice, please get in touch with your usual contact or:

Write to: Boston Financial Investment Management, LP

101 Arch Street

Boston, MA 02110

Attn: General Counsel

For the purpose of this Privacy Notice, Boston Financial Investment Management, LP is the company responsible for collection, use, and disclosure of your personal information under this Privacy Notice.