

# PRIVACY POLICY STATEMENT

FACTS	<b>WHAT DOES BOREL PRIVATE BANK &amp; TRUST COMPANY, A DIVISION OF BOSTON PRIVATE BANK &amp; TRUST COMPANY DO WITH YOUR PERSONAL INFORMATION?</b>
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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 depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> <li>• Social Security number</li> <li>• Retirement assets</li> <li>• Account balances</li> <li>• Checking account information</li> <li>• Transaction history</li> <li>• Wire transfer instructions</li> </ul> <p>When you are <i>no longer</i> our customer, we continue to share your information as described in this notice.</p>
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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 Borel Private Bank & Trust Company, a Division of Boston Private Bank & Trust Company (“Borel”) chooses to share; and whether you can limit this sharing.
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Reasons we can share your personal information	Does Borel share?	Can you limit this sharing?
<b>For our everyday business purposes</b> – such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
<b>For our marketing purposes</b> – to offer our products and services to you	No	We don’t share
<b>For joint marketing with other financial companies</b>	No	We don’t share
<b>For our affiliates’ everyday business purposes</b> – information about your transactions and experience	No	We don’t share
<b>For our affiliates’ everyday business purposes</b> – information about your creditworthiness	No	We don’t share
<b>For our affiliates to market to you</b>	No	We don’t share
<b>For nonaffiliates to market to you</b>	No	We don’t share

Questions?	Call 617- 912-1900 or go to <a href="http://www.bostonprivatebank.com">www.bostonprivatebank.com</a>
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## Who we are

### Who is providing this notice?

Borel Private Bank & Trust Company, a Division of Boston Private Bank & Trust Company (“Borel”)

## What We Do

### How does Borel 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.

We also maintain other physical, electronic and procedural safeguards to protect this information and we limit access to information to those employees for whom access is appropriate.

### How does Borel collect my personal information?

We collect your personal information, for example, when you

- open an account
- apply for a loan
- provide account information
- give us your contact information
- make deposits or withdrawals from your account

We also collect your personal information from others, such as credit bureaus.

### Why can't I limit all sharing?

Federal law gives you the right to limit only

- 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

State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.

## Definitions

### Affiliates

Companies related by common ownership or control. They can be financial and non-financial companies.

- *Borel does not share with our affiliates unless directed to by you.*

### Nonaffiliates

Companies not related by common ownership or control. They can be financial and non-financial companies.

- *Borel 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 services to you.

- *Borel does not jointly market.*

## Other Important Information

**Massachusetts:** Borel has established standards and practices to ensure compliance with the provisions of M.G.L. c.93H and 201 CMR 17.00 relative to the safeguarding of personal information contained in both paper and electronic records for residents of the Commonwealth of Massachusetts.

**California:** Borel has established standards and practices to comply with the restrictions in limiting the disclosure of information relating to private trusts (including managed agency accounts) for which Borel serves as trustee or investment manager.