



## **Privacy Statement**

TSW recognizes that our relationships with current and prospective clients are based on integrity and trust. We work hard to maintain your privacy and are very careful to preserve the private nature of our relationship with you. Over our long history as a financial services provider, we have placed the highest value on the information you share with us. We believe that all our clients value their privacy, so we will not disclose your personal information to anyone unless it is required by law, at your direction, or is necessary to provide you with our services. We adhere to the same high standards to protect nonpublic personal information regarding our former clients as we do for our current clients. We have not sold, and will not sell, your personal information at any time.

We want our clients to understand what information we collect, how we use it and how we protect it responsibly.

### Why We Collect Your Information

We gather information about you and your accounts so that we can:

- Help design and implement the investment related services we provide you;
- Design and improve the services and products we offer; and
- Comply with the laws and regulations that govern us.

### What Information We Collect and Maintain

We commonly collect the following types of “nonpublic personal information” about you, including:

- Information from our initial meeting and subsequent consultations about your identity, such as your name, address, social security number, and financial information (income and assets);
- Information that we generate to service your account (such as trade tickets and account transactions); and
- Information that we receive from third parties with respect to your accounts (such as trade confirmations from brokerage firms and custodial account information).

TSW may aggregate data about visitors to our website in order to improve its design and content. This includes, but is not limited to, how many people visit the site, which pages they visit, and what browser and operating system they use. We may also use cookies (a cookie is a small text file stored on your computer) for session management or to analyze site usage. By visiting our website, users consent to the use of cookies, but if at any time you wish to withdraw your consent for cookie usage then please delete the cookies generated by our website from your browser.

### What Information We Disclose

We are permitted by law to disclose nonpublic personal information about you to unaffiliated third parties in certain circumstances. For example, in order for us to provide investment management services to you, we disclose your personal information in limited circumstances to various service providers, such as brokers and custodian banks. These disclosures typically include information to accept you as a client, process transactions on your behalf, conduct our operations, follow your instructions as you authorize, or protect the security of our financial records.

Otherwise, TSW will not disclose any personal information about you or your account(s) unless one of the following conditions is met:

- We receive your prior written consent;
- We believe the recipient is your authorized representative; or
- We are required by law to disclose information to the recipient.

Arrangements with companies not affiliated with TSW will be subject to confidentiality agreements.

### How We Protect Your Personal Information

Privacy has always been important to TSW. We restrict and limit employee access to client information only to those who need it to carry out their business functions. We educate our employees about safeguarding client information and preventing its unauthorized access, disclosure or use. We also maintain physical, electronic and procedural safeguards to protect your nonpublic information which include proper oversight and resources dedicated to risk identification, protection, detection and incident response procedures. TSW has an incident response program in place to manage data breaches.

### Data Breach Notification

TSW must notify you of data breaches involving an individual's sensitive customer information. The notice must include details about the incident, the types of information involved, and steps for protection. The notification must be sent as soon as possible, but no later than 30 days after TSW becomes aware of the breach.

### Service Provider Oversight

TSW has policies and procedures to ensure its service providers take appropriate steps to protect customer information including disposal of customer information. Service providers must notify TSW of a breach of an individual's sensitive customer information within 72 hours of discovering unauthorized access.

### Recordkeeping

TSW maintains written records documenting its incident response program, service provider oversight, and compliance with the Safeguard and Disposal Rules which require us to protect sensitive customer data.

If you have any questions regarding this policy, or if you would like to be removed from future communications, please email us at [tswinfo@tswinvest.com](mailto:tswinfo@tswinvest.com).