

## **Thomson Horstmann & Bryant, Inc.**

### **Privacy Notice**

At Thomson Horstmann & Bryant, Inc. (together, “THB, Inc.”) preserving and protecting the privacy and confidentiality of each of our customer’s nonpublic personal and financial information is a top priority. In 1999, the Gramm-Leach-Bliley Act was signed into law by Congress, requiring financial institutions to develop guidelines to ensure the safety and confidentiality of customer records and information.

We consider our relationship with our clients our most important asset. We strive to maintain their 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 of 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 have not and will not sell your proprietary information to anyone.

#### WHAT INFORMATION DO WE COLLECT, MAINTAIN AND COMMUNICATE?

THB, Inc. collects and maintains your proprietary information so we can provide investment management services to you. The types and categories of information we collect and maintain about you includes:

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

THB will not disclose any proprietary 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 permitted by law to disclose information to the recipient.

#### HOW WE PROTECT YOUR PROPRIETARY INFORMATION

**To fulfill our privacy commitment, we are instituting firm-wide practices to safeguard the information that we maintain about you. These practices will include:**

- Placing physical, electronic and other safeguards to keep your proprietary information safe;
- Limiting access to proprietary information to those employees who need it to perform their job duties; and
- Requiring certain third parties that perform services for us to agree by contract to keep your information strictly confidential.

Even if you decide to close your account(s) or become an inactive client, we will adhere to the privacy policies and practices described above.