

Ballentine Partners, LLC Privacy Notice

This statement describes our confidentiality policy, including: the types of information we collect, the steps we take to safeguard that information, and the circumstances under which information is shared with nonaffiliated parties.

This notice is being provided to you in accordance with Federal regulations regarding the privacy of consumer financial information. Please take the time to read and understand the privacy policies and procedures that we have implemented to safeguard your non-public personal information.¹

INFORMATION WE COLLECT

The categories of nonpublic personal information that we collect varies with each client relationship. This information may include, for example: full names of family members, addresses, dates of birth, Social Security numbers, passport numbers, detailed information about assets and liabilities, investments, taxable income, cash flow, and transaction history.

We must collect this personally identifiable financial information to allow us to provide advice and services to our clients.

CONFIDENTIALITY AND SECURITY

We are committed to safeguarding the confidential information you have provided to us. We strive to maintain a secure office and computer network environment. Every employee is required to sign a confidentiality agreement regarding information provided by our clients.

INFORMATION WE DISCLOSE TO OTHER PARTIES

We have contracted with some unaffiliated service providers who provide essential services to our clients. These service providers include custodians, accounting firms, system providers, and other enterprises that need access to your confidential information to provide you with brokerage services, security valuation data, and investment reports. In all cases these service providers are required to protect our clients' confidential information by both the terms of our agreements with them and by law. Our written client agreements require us to coordinate the activities and advice of other advisors working with our clients. Those agreements also grant us discretion to share confidential information with your other advisors. Information disclosure is limited to information necessary to plan, effect, administer or enforce a transaction or strategy that is requested or authorized by a client.

¹ Non-public personal information means any personally identifiable financial information and any list, description, or other grouping of consumers derived using any non-public personal information.

No mobile information will be shared with third parties/affiliates for marketing/promotional purposes. All other categories exclude text messaging originator opt-in data and consent; this information will not be shared with any third parties.

REQUIRED DISCLOSURES

On an annual basis, we are required to undergo an annual audit of all client accounts managed by our firm. The audit procedure requires us to disclose confidential information about the accounts that are selected to be audited. The audit firm is legally and contractually bound to keep all client information confidential.

We may be required to disclose confidential personal information to government authorities if we suspect a vulnerable person (an adult age 60 or older or a disabled person) is being taken advantage of. If we have questions or concerns about your health, welfare, decision-making capacity, or potential financial exploitation, we will discuss our concerns with you, if possible. If we are unable to resolve our concerns in that manner, we may contact the individuals you list on the Trusted Contacts Form or the Mental Capacity Form to obtain information about your status. We may also contact the individuals you have authorized to act on your behalf if you are incapacitated or otherwise unavailable and someone not listed on those forms claims to be authorized to act for you. In some states, we are required by law to report suspected cases of elder abuse to the appropriate state authorities. We may also notify your custody agent of our concerns and ask the custody agent to freeze your accounts.

Federal and state regulators may review our firm's records as permitted under law. We also may be required to disclose information to investigators or regulators who are associated with professional organizations, such as the CFP Board or the AICPA.

WE DO NOT SELL PERSONAL INFORMATION

We do not provide any information to mailing list vendors or solicitors for any purpose.

DESTRUCTION OF RECORDS

We maintain personally identifiable information about our clients for the duration of the client relationship, and for the required time thereafter that such records are required to be maintained by federal and state securities laws, and consistent with the CFP Board Code of Ethics and Professional Responsibility. Generally, the required retention period is 6 years after the end of a client relationship. Records are typically selected for destruction one year after that. However, it may not be possible to destroy all copies of records to the extent that they are in electronic format and stored on back-up devices. All electronic back-up devices are stored in a secure vault. Due to the difficulty of locating specific pieces of data on backup media, some electronic records may be retained longer than 6 years.

This notice is required pursuant to Title V of the Gramm-Leach-Bliley Act of 1999.

Please do not hesitate to contact us if you have any questions about the content of this document.

Notice to California Residents – Your Rights Under the California Consumer Privacy Act of 2018 (the “CCPA”) and The California Privacy Rights Act of 2020 (CPRA)

What are my rights under the CCPA?

You have the right:

to know what personal information we are collecting about you;

to know whether their personal information is sold or disclosed by us and to whom;

to say no to the sale of your personal information;

to access their personal information in our possession;

to request deletion of personal information maintained by us in certain instances; and

to equal service and price from us, even if you exercise your privacy rights.

To learn more about your rights under the CCPA and CPRA or to exercise your rights, please call us at any of our offices, or at this toll free number: 1-888-234-7210; or contact us at myccparights@ballentinepartners.com. We will respond promptly to verify your request and to provide the information you requested free of charge within forty-five (45) days of your request.

What types of personal information do we collect?

We collect²:

Identifiers such as a real name, alias, postal address, unique personal identifier³, online identifier, email address, account name, social security number, driver’s license number, passport number or other similar identifiers. signature, telephone number, state identification card number, insurance policy number, employment, employment history, bank account number, credit card number, debit card number or any other financial information, medical information or health insurance information.

² The descriptions used here are taken directly from the CCPA and the CPRA. We are required to use those descriptions in this notice.

³ “Unique personal identifier” means a persistent identifier that can be used to recognize a Consumer, a Family or a Device that is linked to a Consumer or Family, over time and across different services, including, but not limited to, a device identifier; an Internet Protocol address; cookies, beacons, pixel tags, mobile ad identifiers or similar technology; customer number, unique pseudonym or user alias; telephone numbers, or other forms of persistent or probabilistic identifiers that can be used to identify a particular consumer or device. “Family” means a custodial parent or guardian and any minor children over which the parent or guardian has custody. “Device” means any physical object that is capable of connecting to the Internet, directly or indirectly, or to another device.

- Characteristics of protected classifications under California or federal law.
- Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
- Geolocation data.
- Professional or employment-related information.
- Education information, defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act.
- Inferences drawn from any of the information identified in this subdivision to create a profile about a Consumer reflecting the Consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities and aptitudes.
- Other confidential personal financial information.⁴

Do we sell any personal information?

No. Some service providers such as brokers, attorneys, or CPAs with whom we have business relationships will sometimes provide us with software, research or advice that may have value. However, in no event is the provision of such an exchange contingent upon our providing a service provider with access to personal information.

What sources do we use to collect personal information?

We collect information from the following sources:

- directly from you and your family members;
- from your other advisors and business associates;
- from service providers and financial institutions with whom you have relationships; and
- from public sources.

What is our business purpose in collecting personal information?

We collect personal information in order to deliver advice and perform services for which you have engaged us.

⁴ This category does not appear in the CCPA, but it is significant for your work, so have included it.

With whom do we share personal information?

We do not sell personal information. We share personal information only with firms that provide services that are essential to our execution of the mission for which you have engaged us. In all cases, personal information is protected by written agreements that include confidentiality provisions. For example:

- your other advisors, as authorized in writing by you under our service agreement;
- software providers such as SS&C Technologies, which provides software for investment portfolio accounting and reporting), and Black Diamond Software Portfolio which provides trading and portfolio rebalancing tools;
- brokerage firms who are executing transactions on your behalf; and
- investment firms with whom we have sub-advisory relationships.

What specific pieces of personal information do we have about our clients?

Pursuant to a verified request described in question #1 above, we are required to disclose to you the specific pieces of personal information collected about you.

Can I request that the information you have collected about me be deleted?

You have the right to request that we delete any personal information about you which we have collected from you. However, we are not required to comply with your request for deletion in certain circumstances, including if such information is necessary for us to comply with legal obligations, or if we otherwise use your information, internally, in a lawful manner that is compatible with the context in which you provided the information to us.

Summary of information we sell or disclosed for business purposes

What personal information do we sell?

None.

What personal information do we disclose for business purposes?

- Identifiers such as a real name, alias, postal address, unique personal identifier, online identifier, email address, account name, social security number, driver's license number, passport number or other similar identifiers. signature, telephone number, state identification card number, insurance policy number, employment, employment history, bank account number, credit card number, debit card number or any other financial information, medical information or health insurance information.
- Characteristics of protected classifications under California or federal law.

- Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
- Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an Internet Web site, application, or advertisement.
- Geolocation data.
- Professional or employment-related information.
- Education information, defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act.
- Inferences drawn from any of the information identified in this subdivision to create a profile about a Consumer reflecting the Consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities and aptitudes.
- Other confidential personal financial information.