

PRIVACY POLICY

This policy represents Baldwin & Clarke Holding Company, LLC and its related entities, inclusive of Baldwin & Clarke Advisory Services, LLC, Baldwin & Clarke Corporate Finance, LLC, and Baldwin & Clarke, LLP (collectively B&C).

B&C respects the privacy of information that identifies you or is identifiable to you (Personal Information). We want you to understand how B&C processes Personal Information, and how you can submit Privacy Rights Requests to us concerning your Personal Information, in compliance with the various laws in the United States that govern our processing of your Personal Information (Data Privacy Laws). B&C's processing of Personal Information is governed by those Data Privacy Laws as well as this Privacy Policy (Policy).

1. Data Privacy Officer

For questions about B&C's processing of your Personal Information or this Policy, please contact our Data Privacy Officer as follows:

Name: Peter Clarke

Phone: 603-668-4353

Email: peterclarke@baldwinclarke.com

Address: One Bedford Farms Drive – Suite 102, Bedford, NH 03110

2. Personal Information

B&C provides a variety of financial management services (Services), including investment management, financial planning, and corporate advisory services that covers a broad range of categories such as retirement planning, asset protection, estate planning, insurance planning (i.e. life, health, disability, long term care), charitable giving, college savings, M&A and capital advisory, business valuation services, and such other consultative services. We provide Services to individuals, families, business owners, non-profits and businesses generally (Clients).

Depending on the Client, B&C may provide all of the Services listed above, or only some of them as agreed upon by B&C and the client.

In the course of providing Services, B&C receives from Clients, itself collects, and processes Personal Information, which may include the following: (1) identifiers, such as name, physical address, email address, phone number, social security number, driver's license number, passport number, tax identification number, and other government-issued identification

numbers; (2) Institutional Financial Information, such as financial account details, account balance, account history and transactions, trading activity; (3) Personal Financial Information, such as household income, monthly debt, monthly rent, tax status, tax returns, information about your personal investment goals or objectives, records of personal property, investment assets, anticipated living expenses, expected values of future assets such as lump sum distributions from pensions or inheritances; (4) professional or employment-related information, such as current or past job history, professional licenses, professional title, employer's name, and compensation; (5) health-related information; and (6) familial data, such as marital status, and information about your family members that you may provide to us (e.g., name, gender, age and date of birth).

Depending on how you interact with us, we may collect Personal Information when you: (1) visit our website; (2) register for, inquire about, or use the Services; (3) create an account with us, or otherwise use or access the Services; (3) fill out or complete any form available on our website; (4) communicate with us directly or indirectly via email or other methods; (5) subscribe to our mailing lists, newsletter, or other forms of communications; (6) respond to a survey; (5) otherwise interact with us.

B&C has collected Personal Information in the last twelve months and processed it for the purposes described in this Policy.

In certain situations, we may partner with certain third parties and use third party tools in the course of providing Services, and our website may contain links to sites of third parties. We have no control over the policies and practices of third-party websites. Please review the applicable third-party website's policies for further information regarding their collection and processing of Personal Information. The manner in which these third parties collect, and process Personal Information is governed by the policies that apply to them.

3. Children

From time to time, B&C may collect and process Personal Information about individuals who are minors in the jurisdiction where they reside (Children) to provide certain Service to Clients, including but not limited to, education and estate planning, and investment and insurance advisory. Depending on the Services that we provide to Clients, we may collect the following categories of information about Children: first and last name; date of birth; home address; and Social Security Numbers or other government-issued identification numbers in certain situations. If and to the extent you provide Personal Information about Children to us, you acknowledge and

represent that you are the parent or legal guardian of the Child, or otherwise have legal authorization to provide such information to us.

4. Sensitive Information Processed

In addition, in the course of providing Services, B&C may receive, itself collect, and process certain types of Personal Information that is of a sensitive nature (Sensitive Personal Information), including information about the following: (1) Social Security number; (2) governmental identification number, including, but not limited to, driver's license, non-driver identification, passport, and military identification number; (3) bank and other financial account number, and other card holder information (to the extent we require you to do so); (4) race, ethnic origin, national origin, citizenship, immigration status, religious and political belief and affiliation, and sexual orientation and identity; and (5) certain information related to your physical or mental health. For purposes of this Policy, Sensitive Personal Information is a sub-category of Personal Information.

5. Legal Bases for Processing Personal Information

B&C has contractual and other commercial, business, and legal relationships to provide Services to Clients. In the course of providing Services, Clients provide Personal Information to B&C and B&C collects and processes Personal Information to provide Services to them. As a result, we process Personal Information to satisfy our contractual and other commercial, business, and legal relationships to provide Services to you. In addition, B&C seeks and obtains consent for the use of Personal Information if and to the extent consent is required for processing of Personal Information under Data Privacy Laws. That is the legal basis for B&C to process Personal Information.

B&C may process Personal Information to: (1) provide, develop, maintain, and enhance the Services, and our website; (2) understand Client needs and interests and communicate with them about the Services; (3) provide support for the Services including responding to requests, questions, feedback and technical support; (4) process and complete transactions, and send related information, including invoices; (5) personalize your experience with the website; (6) send you communications about our Services that we believe may be of interest, such as information about features, offers, catalogues, promotions, and events; (7) maintain the safety, security, and integrity of our Services, and our website; (8) comply with legal and regulatory obligations, and (9) establish, enforce, and otherwise exercise our rights and defend against claims.

6. Disclosure of Personal Information

Except as necessary or appropriate to provide Services, B&C does not disclose Personal Information that we received from or collected for that Client to any other Client or unaffiliated third party, provided that we may disclose Personal Information for the following purposes and in the following circumstances.

- If directed to do so by the individual about whom such Personal Information pertains, or that individuals' legal representative
- If required to do so by Data Privacy Law, any other law, rule, or regulation, legal process or warrant, or order of any court or governmental agency or authority
- To our agents and service providers necessary or appropriate to provide the Services, such as information technology and security providers, data hosting services, providers that process payments, attorneys, accountants, tax professionals, financial advisers, or any other third party that is necessary or appropriate for B&C to disclose Personal Information to in order to provide the Services. Unless we tell you differently, our agents and service providers do not have any right to use the Personal Information we share with them beyond what is necessary to assist us in providing Services to you
- In connection with a sale, merger, consolidation, change in control, transfer of substantial assets, reorganization, or liquidation of B&C
- To entities that perform marketing, advertising or market research on our behalf or help us determine the effectiveness of our marketing
- If we determine that doing so would be in the public's interest
- For protection of B&C and others

7. Privacy Rights

Depending on the Personal Information that B&C has about you, and depending on the manner in which we process your Personal Information, you may have the following privacy rights related to our processing of your Personal Information.

- Be informed about how your Personal Information is being processed, the categories of Personal Information being processed, and the categories of sources from which your Personal Information has been collected
 - Be informed about whether and how your Personal Information being processed is being sold, shared, traded, disclosed, exchanged or brokered with unaffiliated third parties, and which categories of your Personal Information are being sold, shared, traded, exchanged or brokered with unaffiliated third parties
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- Access or receive a copy of your Personal Information
- Rectify or correct inaccurate or incomplete Personal Information about you
- Erasure or deletion of certain of your Personal Information
- Limit, object and opt-out of processing of your Sensitive Personal Information
- Opt-out of the sale, sharing, trading, exchange, and brokering of your Personal Information with unaffiliated third parties
- Withdrawal of your consent to processing of your Personal Information to the extent such processing is based on your consent, provided that such withdrawal will not affect the lawfulness of B&C's use of your Personal Information before such withdrawal
- Portability of your Personal Information in a commonly used format
- Non-discrimination for exercising your privacy rights

To make a request concerning these rights, please complete and submit the [Privacy Rights Request Form](#) on our website. We will confirm receipt of all such complete Privacy Rights Request Forms within 15 days of receipt. We will substantively respond to all such requests within 45 days, subject to any lawful extension of that period. Additionally, there may be a delay in processing a request while we verify that the request is valid and originates from you as opposed to an unauthorized person.

Please be aware there may be valid reasons to refuse a request, including legal and regulatory requirements that we retain and process certain information. Also, please be aware that certain requests may limit or prevent us from providing Services to you. In those situations, we will notify you in writing within 45 days. You may also contact our Data Privacy Officer for help with those situations.

B&C will not discriminate against you if you exercise any of the foregoing rights or any other rights under Data Privacy Laws, including, by not denying Services to you, not providing a different level or quality of Services to you, and not suggesting that you will receive a different level or quality of Services.

8. Selling, Share, Trading, Exchanging and Brokering Personal Information

B&C does not sell, share, trade, exchange, or broker Personal Information (including as those terms are defined and used in Data Privacy Laws) in any way, including for itself, or any unaffiliated third party. If and to the extent any unaffiliated third party sells, shares, trades, exchanges, or brokers your Personal Information, that unaffiliated third party is solely responsible, to the extent required by Data Privacy Law or otherwise, to notify you and obtain your consent for such sale, sharing, trading, exchanging or brokering of your Personal

Information. If and to the extent you want to opt-out of the sale, sharing, trading, exchanging, or brokering of your Personal Information, please complete and submit the [Privacy Rights Request Form](#) on our website, and we will address such requests as described in the foregoing section of this Policy.

9. Automated Decision Making

B&C does not use automated decision making or profiling in the processing of your Personal Information, and does not make decisions that affect you based on automated decision making or profiling using your Personal Information.

10. Duration of Retention

Because the Services that B&C provides vary significantly from Client to Client, the duration we retain Personal Information varies significantly, depending on the types of Services that B&C provides to a particular Client and the duration and depth of B&C's relationship with a particular Client. B&C endeavors to retain Personal Information that it receives from or collects for a Client for only as long as is necessary or appropriate to provide Services to that Client.

11. Cookies

When you visit our website, B&C may place a cookie (small text files that are saved by your web browser and stored on your computer, mobile phone or any other device when accessing webpages that use them) on your device so that we have the ability to customize the look and feel of the Site for you. Cookies remember information about you, your preferences, and your device for better user experience when visiting our website. Using cookies, we may also collect a variety of other information regarding your usage of the website, including your Internet protocol address, username, session identification, browser you are using, web pages you view and referring web pages, when you access our website, and general online behavior for performance and marketing purposes. You can change the settings on your browser to prevent Cookies from being stored on your computer without your express consent.

12. Website Analytics Services

We may use third-party analytics tools, including "Google Analytics," to collect information about visitors and their usage of our website (including how often users visit our website, what pages they visit, among other information). We use the information we get from these tools to improve our website. You can prevent Google Analytics from recognizing you on return visits to our website by disabling cookies on your browser.

13. Changes to Policy

B&C reserves the right to change or amend this Policy at any time and for any reason, including to remain in compliance with Data Privacy Laws.

14. Questions or Concerns

For questions or concerns, please contact our Data Privacy Officer as follows:

Name: Peter Clarke

Phone: 603-668-4353

Email: peterclarke@baldwinclarke.com

Address: One Bedford Farms Drive – Suite 102, Bedford, NH 03110

Last Updated: 11/22/2024
