



BAYSTATE WEALTH MANAGEMENT LLC

Privacy Policy and Notice

It is the policy of Baystate Wealth Management, LLC ("BWM") that all non-public information of or about our clients (hereinafter "Client Information") shall remain confidential. This includes disclosures of information to family members, friends, and other clients. BWM does not sell Client Information to anyone. BWM will only share Client Information with non-affiliated third parties, as stated in this Policy or as permitted by law, unless BWM provides you with an additional notice or obtains your permission.

Client Information includes any information obtained from any client from account applications and other forms submitted to BWM, as well as personal information we may collect from a client's transactions and experiences with BWM, or from others relating to the products and services we provide.

BWM representatives may be registered representatives of registered broker-dealers that are not affiliated with BWM and BWM may have relationships with other non-affiliated investment advisor firms, insurance companies, trust companies, custodians, other financial services firms, accountants and law firms. Except in connection with providing services under an Engagement Letter with BWM, or as permitted under this Policy or as permitted by law, BWM does not share Client Information with non-affiliated parties without your permission or direction.

The safeguarding of Client Information is an issue taken seriously at BWM. To affirm our continuing commitment to the proper use of Client Information, we have set forth the following Privacy Policy. This Privacy Policy guides BWM and its representatives in serving the privacy needs of our clients.

1. **Recognition of a Client's Expectation of Privacy:** At BWM, we believe the confidentiality and protection of Client Information is one of our fundamental responsibilities. And while information is critical to providing quality service, we recognize that one of our most important assets is our clients' trust. Thus, the safekeeping of Client Information is a priority for BWM.
2. **Client Information Collected:** BWM collects and uses various types of information to service your accounts, to save you time and effort and to better understand your needs and your investment goals and objectives. The Client Information we collect and store generally consists of the following:
 - A. Information gathered from applications, investment policy statements and questionnaires, forms, and other information you provide to BWM, in person, by telephone, electronically or by other means, such as your name, address, social security numbers, assets, income, debt, spending habits, investment objectives and financial goals.
 - B. Information about your transactions and your account experience with BWM, such as your account balances, trading activity, payment history and parties to transactions and investments.
 - C. Information such as employment, insurance, tax and legal planning, together with information concerning retirement plans, wills trusts, mortgages, tax returns and employee benefits.
 - D. Any other information that may be obtained from other relationships that our clients may have with other professionals and providers such as accountants, attorneys, insurance agents, bankers, etc.
3. **Managing Client Information:** The information we share within BWM helps us provide you with better service and more options. From time-to-time, BWM may be obliged to share Client Information to comply with reporting and other legal requirements.

Sharing Information within BWM

BWM may share Client Information within the company and between company representatives and employees, as necessary to properly service your account(s).

Sharing Information with Companies that Work With BWM

BWM may share Client Information with unaffiliated third parties who perform services for BWM and its clients, or in connection with the servicing or processing of accounts, and products and services provided to clients. These companies may include other financial service providers such as custodians, broker/dealers, outside managers, transfer agents and the like. These companies may assist us in fulfilling your service requests, processing your transactions, handling electronic transmission of information including emails, transmitting your account statements, etc.

Sharing Information with Other Advisors

Except in connection with providing services under an Engagement Letter with BWM, or as permitted under this Policy or as permitted by applicable law or rules of self regulatory organizations, BWM does not share Client Information with non-affiliated parties without your permission or direction.

4. **Maintenance of Accurate Information:** BWM recognizes that it must maintain accurate client records. Therefore, BWM has established procedures to maintain the accuracy of Client Information and to keep such Information current and complete. These procedures include responding to requests to correct inaccurate information in a timely manner. If your Client Information is ever inaccurate, incomplete or in need of updating, please contact us at: 617-585-4500 or correspond to us in writing or electronically and we will endeavor to update your Information as soon as possible. If you have questions, or believe your Client Information has not been handled properly, you may always contact BWM and we will provide an answer or investigate your concerns and report to you the findings of our investigation.
5. **Limiting Employee Access to Information:** At BWM, employee access to personally identifiable Client Information is limited to those with a business reason to know such information. Employees are educated on the importance of maintaining the confidentiality of Client Information and on this Privacy Policy. Because of the importance of these issues, all BWM employees are responsible for maintaining the confidentiality of Client Information and employees who violate this Privacy Policy will be subject to disciplinary measures.
6. **Maintaining Client Privacy in Business Relationships with Third Parties:** If BWM provides personally identifiable Client Information to a third party with which we have a business relationship, BWM insists that the third party keep such Information confidential, consistent with the conduct of our business relationship.
7. **Keeping Up-To-Date With BWM's Privacy Policy:** BWM will provide notice of our Privacy Policy annually, so long as you maintain a relationship with BWM. BWM reserves the right to make changes to this Policy. You can always contact us and request the current version of our Privacy Policy.
8. **Former Clients:** Even if you are no longer a client of BWM, this Privacy Policy will continue to apply to you.
9. **Your Choices About Certain Uses and Disclosures of Client Information:** The Gramm Leach Bliley Act of 1999, as may be amended from time-to-time, requires that BWM give you the option to prohibit disclosure of your Client Information to non-affiliated third parties for marketing purposes, if BWM were to make such disclosures. This is referred to as your "opt-out" right. However, since BWM only discloses such information for such purposes with your consent, it is not necessary for BWM to provide you with an "opt-out" opportunity as it has already been exercised for you. If you want your Client Information to be disclosed for marketing purposes, you must either give us instructions to do so, or send us a written consent signed by you directing us to make such disclosures.

This Privacy Policy applies to individuals, and we reserve the right to change this Privacy Policy, and any of the policies or procedures described above, at any time without prior notice. If BWM does change its Privacy Policy, we will notify our clients. This Privacy Policy is for general guidance and does not constitute a contract or create legal rights and does not modify or amend any agreements we have with our clients.