

# BAYSTATE WEALTH MANAGEMENT, LLC d/b/a MARINER PRIVACY POLICY NOTICE

## **Our Commitment to your Privacy**

As a client or prospective client of Baystate Wealth Management, LLC (the "Firm" or "BWM"), you share both personal and financial information with us. Your privacy is important to us, and we are dedicated to safeguarding your personal and financial information.

#### Information Provided

In the normal course of business, such as when you open an account, direct us to buy securities, seek advice about your investments, or enter into a contract, we typically obtain nonpublic personal information about our prospective and current clients, which may include but is not limited to:

- Personal identity such as name, address and Social Security Number;
- Information regarding securities transactions effected by us or others;
- Information reported on applications or other forms provided by the client, including but not limited to net worth, assets, income, accounts and balances; and
- Information developed as part of financial plans, analysis and other advisory services.

### **How We Manage and Protect Your Personal Information**

In order to protect current, prospective and former clients' nonpublic, personal information, we maintain physical, electronic and procedural safeguards. The Firm also limits access to personal information to individuals who need to know that information in order to service your account and provides training to its employees on proper handling of personal information.

Our Privacy Policy restricts the use of your information and requires that it be held in strict confidence. Specifically:

- We do not share any of the above referenced non-public personal information about current, prospective and/or former clients to third parties, other than to our affiliates for everyday business purposes (but not information about your creditworthiness), nor is it our practice to disclose such information to third parties unless necessary to administer, manage, service, and provide related services for client accounts, to offer our products and services to you through marketing, or as permitted to do so by law.
- In the event we deem it necessary to share information with outside companies that perform administrative or marketing services for the Firm, our contractual arrangements with these service providers require them to treat current, prospective and/or former client information as confidential and to not use it for any purpose beyond the scope of the agreement.

- Except as otherwise stated above, we will only release non-public personal information if a client or client representative directs us to do so, or if we are compelled by law to disclose personal information, such as to government entities, credit bureaus or in response to subpoenas.
- We will not share your non-public personal information with a non-affiliate for purposes of the non-affiliate to market to you.

In situations where a financial institution does disclose customer information to nonaffiliates, other than permitted or required by law, customers must be given the opportunity to opt out or prevent such disclosure. As described herein, the Firm does not share or disclose current, prospective and/or former clients' nonpublic, personal information to nonaffiliates except where permitted or required by law.

#### **Definitions**

**Affiliates.** Companies related by common ownership or control. They can be financial and nonfinancial companies.

**Nonaffiliates**. Companies not related by common ownership or control. They can be financial and nonfinancial companies.

#### **State-Specific Information**

**VT Residents:** For accounts with a Vermont mailing address, we may disclose all of the information we collect, as described above to companies that perform marketing services on our behalf.

**CA Residents:** For accounts with a California mailing address, we may disclose all of the information we collect, as described above to companies that perform marketing services on our behalf. California residents may also have additional rights in connection with their non-financial data, as outlined in our <u>California Privacy Policy Notice</u>.

#### **Tax Services**

To the extent our employees or affiliates are providing tax services as certified public accountants, we are governed by professional standards set forth by the American Institute of Certified Public Accountants Ethical Standards and governing state accountancy laws.

Information that we receive from you for the specific purposes of receiving tax services provided by the Firm shall be retained and eventually disposed of in accordance with applicable federal and state laws that govern general public accountants.

#### **Client Notifications**

We will annually provide a notice to clients of our privacy policy. In the event of any material changes to our privacy policy, we will provide clients with notice of such changes.