

**Vestmark Advisory Solutions, Inc.**  
**Privacy Notice**  
**January 6, 2017**

**Our Privacy Policy.** In providing services related to the management of your account, Vestmark Advisory Solutions, Inc. (“VAS”) may obtain nonpublic personal information about you. We recognize the sensitive nature of this information and take appropriate precautions to protect your privacy. Our policy is to keep this information safeguarded and confidential and to use or disclose it only as necessary to provide services to you or as otherwise required by law. We do not sell, rent or trade any information about current or former clients.

**Collection of Information.** Nonpublic personal information is personally identifiable financial information about you as an individual or your family. The types of nonpublic personal information we may collect includes your name and brokerage account numbers as well as the assets and transactions within such brokerage accounts. This information is provided to us by or on behalf of your financial adviser solely for the purpose of enabling us to provide services related to the management of your account.

**Information We Disclose.** We disclose nonpublic personal information about you only to those persons that provide services to your account or as required by law or specifically authorized by you. The following is a description of the categories of persons who may have access to this information.

Within VAS. VAS employees are given access to the information that they need to perform work on your behalf. We maintain internal policies against unauthorized disclosure or use of client information by employees.

Your Financial Advisor. Should your financial adviser request our assistance in calculating or verifying the accuracy of fees for advisory or asset management services, we may include supporting details such as account names and balances.

Courts and Governmental Entities. Federal or state law or court order may require us to share information about you. In such circumstances, only the specific information required by law, subpoena or court order will be shared.

**How We Safeguard Your Information.** We restrict access to nonpublic personal information as described above. We maintain physical, electronic and procedural safeguards to protect confidentiality of all nonpublic personal information in our possession.

VAS reserves the right to change this Privacy Policy at any time. If you have questions about our Privacy Policy, please contact us at (202) 256-1914.