

# PRIVACY NOTICE



**OUR PRIVACY POLICY.** This notice is being provided by Okabena Company and its affiliates Okabena Investment Services, Inc. and Boulder Bridge Trust Company (referred to collectively as “Okabena”). In providing various financial, investment and trust services and products to you, we collect certain nonpublic personal information about you for our everyday business purposes. Our policy is to keep this information confidential and strictly safeguarded, and to use or disclose it only as needed to provide services to you, or as permitted by law. Protecting your privacy is important to us.

**PURPOSE AND SCOPE** Financial companies are required to protect the privacy of nonpublic customer personal information. Federal law gives clients the right to limit some but not all sharing of their personal information. If a financial company discloses customer information to nonaffiliated third parties, other than permitted or required by law, clients must be given the opportunity to opt out or prevent such disclosure. Okabena does not share or disclose customer information to nonaffiliated third parties except as permitted or required by law and as a result there no opt-out is provided. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

**INFORMATION WE COLLECT.** The types of personal information we collect and share depend on the services you receive or request from us. Much of this is typically collected in forms you complete or information you provide at the time you become a client and thereafter as needed to provide a particular investment, financial or trust service. This information can include any of the following.

- Name, address, email address, date of birth and social security number and information about your employment, income, assets, beneficiaries and names of relatives.
- Information contained in government-issued identification documents you provide to us.
- Information about your transactions with us or others (such as account activity, loan history, and transaction information from other banks and financial advisers/investment managers with whom you work or have worked).
- If needed for a particular service or request, loan numbers, bank/brokerage account numbers, credit card numbers and insurance policy numbers.
- Information we receive from insurance companies, agencies, personal accountants and attorneys, such as insurance coverage, income taxes, estate affairs and family circumstance.
- Information necessary to complete tax filings, including tax statements from other funds/managers and any personal information requested by the IRS to confirm your identity in connection with such filings.

**INFORMATION WE SHARE INTERNALLY.** In order to effectively administer, operate, facilitate and manage your relationship with Okabena, our employees will have access to your personal information. Okabena employees are subject to duties of loyalty and confidentiality and are regularly trained on privacy and confidentiality standards.

**INFORMATION WE SHARE WITH THIRD PARTIES.** All financial companies need to share customers’ personal information to run their everyday business. We may disclose any of the information we collect, as described above, with nonaffiliated third parties, including:

- Brokerage, investment, banking and custodial firms that we work with to provide services to you;
- Companies that perform support services for us, including network and managed service providers, other technology providers, account data aggregators, processors and reporters, administrative services providers, and auditors, attorneys and other consultants;
- Others as permitted or required by law, such as government regulators, in responding to subpoenas and other legal processes; and

- Others with whom you have requested us to share information.

Where applicable, we require strict confidentiality agreements with these third parties and expect them to keep this information private. We do not sell your personal information to anyone and do not share your personal information with anyone for marketing purposes. If we make changes to our information sharing policy in the future that trigger your ability to opt out of such sharing, we will notify you in writing with an “opt-out” option prior to sharing that information.

**HOW WE SAFEGUARD YOUR INFORMATION.** We have physical, electronic and administrative safeguards in place that are designed to protect the security and confidentiality of your information. These include advanced network, computer and mobile device protections, secure office premises, locked file rooms, procedures around the electronic transmission and receipt of personally identifiable information, confidentiality and/or security agreements with applicable third parties and strict confidentiality policies that apply to all Okabena personnel. We review these safeguards periodically and as needed to seek to provide a robust security environment for your information.

**RETAINING YOUR INFORMATION.** Information about you will be maintained during the time you are an Okabena client, and for the required time thereafter that such records are required to be maintained by federal and state laws. After this required period of record retention, all such information may be destroyed in a secure manner without notice to you.

**ACCURACY OF AND PROVIDING YOUR INFORMATION.** Okabena makes every effort to keep your personal information accurate and up to date. If you identify any inaccuracy in your personal information, need to make a change to that information or need to provide Okabena with new information, please contact us at (612) 339-7151 or send the information using secure email to your Okabena contact. For security reasons, we ask that you do not send personal information via regular email.

**OUR WEBSITE.** We use cookies and similar technologies (“Cookies”) to track information provided by your browser when you use our website. A Cookie is a small piece of information that a website stores on your web browser on your device and can later retrieve. “Session” Cookies are temporary and will expire at the end of a browser session; that is, when you leave the website. Session Cookies allow the website to recognize you and carry information as you navigate between pages during a single browser session. This allows you to use the website most efficiently. “Persistent” Cookies, in contrast, remain in the Cookie file of your browser even after you leave the website and after the browser is closed. These Persistent Cookies enable the website to recognize you on your return, remember your preferences and provide tailored services to you. A Cookie will not contain information that will enable us to contact you via telephone, e-mail, or other means. Our website uses Session and Persistent Cookies to permit us and our website service partners to: measure your use of the website in an effort to improve its quality and enhance your overall experience, including tracking page views, time and date of website access, and other usage and navigation data, and identifying your operating system and browser type (but not other information about your computer or the files or programs on it) and your general geographic location; and to aggregate usage data to track trends and analyze patterns on the website. If you do not wish to accept Cookies from the website, please either disable them or refrain from using the website.

**CONTACT US.** If you have questions regarding this Privacy Notice or our privacy practices, please contact us at (612) 339-7151. We reserve the right to change the policies and practices described in this Privacy Notice at any time. If we do, we will promptly provide you with an updated Privacy Notice.