The Colony Group

PRIVACY STATEMENT

The Colony Group, LLC ("Colony") has adopted this policy in recognition that protecting the privacy and security of the non-public personal information we obtain about our clients is a critical component of the services that we offer.

All financial advisory companies choose how they share your non-public personal information. Federal law gives you the right to limit some, but not all, sharing and also requires us to tell you how we collect, share, and protect your non-public personal information. Even when you are no longer our client, we will only share your non-public personal information as described in this notice. Please read this notice carefully to understand how we protect and/or share your non-public personal information.

The types of non-public personal information we collect and share depend on the services we provide to you. This information can include items such as your contact information, Social Security number, income, account information (such as account number(s) and transaction history), and tax information.

We collect your non-public personal information in a variety of ways. For example, we obtain your non-public personal information when you open an account, give us information about your income and assets, tell us about your portfolio, deposit or transfer money, or enter into an investment advisory contract. We also may collect your non-public personal information from third parties (e.g., the custodians of your accounts).

All financial advisory companies need to share clients' non-public personal information to run their everyday business. Below, we describe the reasons we can share your non-public personal information and whether you can limit this sharing.

We share your non-public personal information for our everyday business purposes, such as to process your transactions and maintain your account(s). We also may need to share your information to respond to court orders and legal investigations, report to credit bureaus, protect the confidentiality or security of your records, or as required by law. We also may use or share your non-public personal information for our own firm's purposes with the goal of marketing our products and services to you.

Federal law gives you the right to limit the following: sharing non-public personal information about your credit worthiness for our affiliates' everyday business purposes; sharing non-public personal information about you with our affiliates to market to you; and sharing non-public personal information with *non*-affiliates to market to you. Colony does not share your non-public personal information in any of these ways. State laws and individual companies may give you additional rights to limit sharing.

Unless we have a service agreement in place with an affiliate for the purpose of providing advisory services to you, we do not share non-public personal information with our affiliates. However, we do share certain non-public personal information with a non-affiliate for the purpose of aggregating it and providing summary information based on this data to our parent company, Focus Financial Partners, LLC. This summary information excludes client-level identifiable data.

To protect your non-public personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.

Our policy about obtaining and disclosing non-public personal information may change from time to time. We will provide you notice of any material change to this policy before we implement the change.

If you have questions please call us at (617) 723-8200.