



TRILLIUM ASSET MANAGEMENT, LLC

PRIVACY POLICY

The privacy of your personal information is important to us at Trillium Asset Management (“Trillium”, “TAM”, “we”, “us”, or “our”). We are committed to protecting the privacy of that information. Furthermore, the privacy of your personal information may be protected by various government laws or regulations.

At the same time, in order to provide you with services you may request, it is necessary for us to possess some personal information of yours. Similarly, without some of that information, we cannot inform you about the services we have available or that you may request (though if you are currently receiving information or marketing communications from us, you may opt-out of receiving further communications at any time).

This privacy statement explains our personal information policies and practices. It includes, but is not limited to, explanations of the types of personal information we may collect about you, the purposes for collecting such information, the circumstances under which we may disclose such information to third parties, the measures we take to secure the confidentiality of such information, your rights regarding your personal information, and the way to contact us to exercise those rights.

TYPES OF INFORMATION WE COLLECT

We collect personal information from you in order to offer or provide you with products or services, process transactions on your behalf and comply with legal and regulatory requirements. Information may be collected from any of the following sources:

- From You: We collect information from you when you request information or services from us or enter into an investment management agreement with us or a subscription agreement with a fund we manage. We also collect information from investor questionnaires, W-9’s and other applications or forms that you complete when requesting information or services from us. This information may include items such as:
 - your name

Active Portfolios, Global Impact: Putting Assets into Action since 1982

- address
- e-mail address
- social security number
- birth date
- annual income
- net worth
- marital status
- investment goals
- investment risk tolerance.

If you indicate you have a spouse or partner, his/her personal and financial account information may be requested.

- From Transactions: If you obtain advice or services from us, we keep records of the advice or service provided. We keep records relating to items such as:
 - your account balance
 - payment history
 - securities positions
 - securities purchases and sales.

This enables us to provide you with a history of your transactions with us and service your account.

- From our Web Site: If you visit our website, we collect only the information that you provide to us when you register on the site to receive e-mail updates of our products. We may also collect your e-mail address when you send us an e-mail or send a letter to the editor of our newsletter. We do NOT use so-called "cookies" to track the amount of time you spend on our site, the parts of our site you visited, and other technical information. We invite you to review our website privacy policy at www.trilliuminvest.com by clicking on "privacy and usage notices here" that can be found at the bottom of our home page.



PURPOSES FOR COLLECTING YOUR PII

You may provide your Personally Identifiable Information (“PII”) to TAM in order to fulfill a Service. You are then entering a business relationship with TAM and are agreeing to the use of that data by TAM and its applicable worldwide affiliated companies, as stated in this Privacy policy. We request PII for a variety of purposes throughout your interaction with TAM, some of which are listed below:

- The performance of obligations under your Investment Management Agreement (“IMA”), the governing agreements of the applicable Funds and/or one or more investors’ subscription agreements with respect to the applicable Accounts and Funds (and all applicable anti-money laundering, “know-your-client” and other related laws and regulations), including in assessing suitability of potential investors in the Funds.
- The administrative processes (and related communication) carried out between the Authorized Entities in preparing for the acceptance of your account and the admission of investors to the Funds.
- Ongoing communication with existing and potential clients, investors and their respective representatives, advisors and agents, (including the negotiation, preparation and signature of documentation), including during the process of accepting your account and admitting potential investors to the Funds.
- The ongoing administrative, accounting, reporting and other processes and communication required to operate your account and the business of the Funds in accordance with your IMA, the governing agreements of the applicable Funds and other applicable documentation between the parties.
- Keeping existing and potential clients and investors informed about the business of TAM and its affiliates, including offering opportunities to make investments other than to the Trillium strategies and the Funds.
- Contacting you or your designated representative by phone, email, fax, or mail.

Active Portfolios, Global Impact: Putting Assets into Action since 1982



- Providing you or your representative with marketing communications.
- Creating and managing your account with us.
- Sharing information about our Services including investment research.
- Facilitating financial transactions related to your account.
- Ongoing communication with you and/or your designated contacts.
- The ongoing administrative, reporting, and other processes and communication required to operate the business in accordance with the agreements and other applicable documentation between the parties.
- To collect information for our recruiting process.
- Any legal or regulatory requirement.
- Any other purpose that has been notified, or has been agreed, in writing.

LAWFUL BASIS

There is a need to process PII for the purposes set out in this privacy policy as a matter of contractual necessity under or in connection with the applicable agreement, and in the legitimate interests of TAM to operate their respective businesses. From time to time, TAM may need to process the PII on other legal bases, including: to comply with a legal obligation; if it is necessary to protect the vital interests of an investor or other data subjects; or if it is necessary for a task carried out in the public interest. For the purposes listed above, TAM is relying on performance of a contract necessity and legitimate interests.

A failure to provide the PII requested to fulfill the purposes described in this Privacy policy may result in TAM being unable to provide the services in connection with the terms of the IMA or subscription agreement.

Active Portfolios, Global Impact: Putting Assets into Action since 1982



DATA STORAGE AND RETENTION

Your PII will be retained only for as long as the information is needed to fulfill the purposes for which it was collected and processed. We reserve the right to retain and use your PII for as long as necessary to comply with our legal obligations and business requirements and/or to resolve ongoing disputes and enforce our agreements.

PROTECTION OF PERSONALLY IDENTIFIABLE INFORMATION

We maintain physical, electronic, and procedural security measures that comply with applicable legal and regulatory standards to safeguard your PII. Access to such information is restricted to those employees who are trained in the proper handling of client information and have a legitimate business need to access that information. We follow generally accepted standards to protect the PII you submit to us, whether that information is in transit or at rest.

OUR SITE AND USE OF COOKIES

"Cookies" are small data files that are stored on your hard drive that store certain information, including certain PII, accessible to our Sites, such as your password and any information content preferences you may voluntarily set at our Sites. You can refuse the use of cookies by selecting the appropriate browser setting. For information on how to remove or manage cookie functions and adjust your privacy and security preferences, access the "help" menu on your internet browser, or visit <http://www.aboutcookies.org/how-to-control-cookies>.

Our site **DOES NOT** use cookies and other technologies that collect personal information.

Active Portfolios, Global Impact: Putting Assets into Action since 1982



AUTOMATED DECISION MAKING

We do not use automated processing, including profiling, to make decisions that will have either legal or material effects on the individuals from whom we collect and process PII.

SHARING YOUR PII

Your PII may be combined with information we receive from other sources, or it may be provided to other organizations we work with. This section details that sharing of your PII.

Receiving PII from Third Parties

We may receive information about you from other sources and combine that information with the PII we collect directly from you. For example, we may receive payment information from the organization you use to pay us in order to correct our records. Additionally, to promote protection of your identity, we also may collect credit or identity information which we use to help prevent and detect fraud.

Sharing PII with Third Parties

We do not and will not sell your PII. If we share your PII with third parties performing services for us, or acting on our behalf, we will not allow them to use your information for other purposes, and we will contractually require them to protect your information.

We may share your PII with our affiliates, business partners, and other third parties. We may do so for the purposes of operating our business, delivering and improving the Services we provide to you, as well as for other legitimate purposes permitted by applicable law such as sending marketing and other communications related to our business.

We may share your PII with third parties for a variety of additional purposes including, but not limited to:

Active Portfolios, Global Impact: Putting Assets into Action since 1982



- Within TAM and our affiliates and subsidiaries for data processing or storage purposes.
- With business partners and suppliers to provide Services and help facilitate transactions (including processing orders, event registrations, data storage, marketing communications and customer support).
- In response to a request from law enforcement, government authorities, or other third parties as necessary to comply with legal process or to meet national security requirements. This may be related to tax reporting services or pursuant to a court order.
- With our affiliated private fund general partner in order to offer investment opportunities or to provide services related to your investment in the private fund
- With unaffiliated service providers such as brokers, fund administrators, custodians, and transfer agents in connection with processing transactions for your account. Your personal information may also be provided to attorneys, accountants, or auditors in order to enable us to provide requested services to you and to comply with legal and regulatory requirements.

Active Portfolios, Global Impact: Putting Assets into Action since 1982



TRANSFERS OF PII

Your PII may be transferred, processed and/or stored in a country other than the one in which your PII is collected. When transferring your PII to the US or other countries, we have implemented procedures to validate that appropriate safeguards are in place to protect the PII regardless of where it is being transferred to.

TAM may transfer PII to a non-equivalent country (a country or territory other than (i) a member state of the EEA; or (ii) a country or territory which has at the relevant time been decided by the European Commission in accordance with EU law to ensure an adequate level of protection for PII), in order to fulfill the purposes described in this Privacy Notice and in accordance with applicable law, rule or regulation, including where such transfer is a matter of contractual necessity to enter into, perform and administer agreements, and to implement requested pre-contractual measures. For information on the safeguards applied to such transfers, please contact this number (800-548-5684) or privacy@trilliuminvest.com.

YOUR EU DATA SUBJECT RIGHTS

The European Union's General Data Protection Regulation ("GDPR") is a sweeping piece of legislation that grants EU residents increased control over their PII. The GDPR allows consumers to access their PII and find out details of how that data is processed, to rectify inaccurate PII, to have their data erased (when certain conditions are met), to restrict processing of their data, and more. It requires affected companies to create processes to comply with and facilitate consumer data requests, to update their privacy policies, and to ensure that PII is secured.

Specifically, the GDPR and other national privacy laws provide data subjects with certain rights regarding their PII. If you are an individual who resides in the EU and whose PII is collected and processed by TAM, you have the right to:

- Request access to your data
- Rectify your data

Active Portfolios, Global Impact: Putting Assets into Action since 1982



- Take your data (in a readable, “portable” format) to another service provider
- Erase your PII
- Restrict or object to the processing of your PII
- Lodge a complaint with a Member State Supervisory Authority
- Withdraw previously given consent to collect and process PII (which will not impact PII processed before the withdrawal)

Active Portfolios, Global Impact: Putting Assets into Action since 1982

AMSTERDAM BOSTON EDINBURGH LONDON MELBOURNE PORTLAND SAN FRANCISCO SYDNEY www.trilliuminvest.com



PII RIGHTS FOR CALIFORNIA RESIDENTS

The California Consumer Privacy Act (“CCPA”) requires us to make certain additional disclosures and provides California residents with the ability to request additional information about their PII. If you are a California resident and it is determined that the CCPA applies to you, this section details those rights, how you may exercise them, and what TAM will do in response.

Please note that the rights under the CCPA do not apply to PII collected, processed, sold or disclosed pursuant to Gramm-Leach-Bliley Act (Public Law 106-102) and Fair Credit Reporting Act (12 CFR 1022).

If you are an individual who resides in California and whose PII is collected and processed by TAM, you may have the right to:

- Request that we disclose, free of charge, the categories and specifics of the PII we collect about California residents, the sources from which the PII was collected (and/or, if applicable, sell or otherwise disclose to a third party), and the business purpose for collecting PII.
- Choose to opt-out of the sale of PII. Currently, however, TAM does not sell PII.
- Request that we delete the PII we have collected. Following our verification of the request, we will comply with the request and delete any or all the PII in our possession that we collected from the California resident and/or any or all such PII in the possession of our service providers, unless otherwise restricted by law or regulation.

Non-Discrimination for Exercising Your PII Rights

We follow the requirements of California Civil Code §1798.125, and will not discriminate against any consumer who exercises the rights set forth in this privacy policy.

Active Portfolios, Global Impact: Putting Assets into Action since 1982



QUESTIONS OR CONCERNS AND EXERCISING YOUR DATA SUBJECT RIGHTS

If you have any questions or concerns regarding the information in this privacy policy, or would like to exercise any of your rights set forth in this privacy policy, please contact this number (800-548-5684) or privacy@trilliuminvest.com. Please include a description of what right you want to exercise and the information to which your request relates. Please note that you may only make a disclosure request twice within a 12-month period.

Verifying Your Identity

If you choose to contact us with a request, you will need to provide us with identifying information that matches the PII we currently have about you.

Authorized Agent

You have the right to appoint an authorized agent to exercise your rights on your behalf. If you would like to do so, please contact this number (800-548-5684) or privacy@trilliuminvest.com.

Accessibility Information

For consumers with disabilities who need to access this policy in an alternative format, please contact: this number (800-548-5684) or privacy@trilliuminvest.com.

CHANGES TO THIS PRIVACY NOTICE

From time to time we may update this privacy notice. If revisions are made to the privacy notice, we will update the statement with a new revision date.

This privacy notice was last revised and posted on July 28, 2021.

Active Portfolios, Global Impact: Putting Assets into Action since 1982

AMSTERDAM BOSTON EDINBURGH LONDON MELBOURNE PORTLAND SAN FRANCISCO SYDNEY www.trilliuminvest.com