

THAYER PARTNERS, LLC

Privacy Policy

Thayer Partners, LLC (“Thayer”) maintains physical, electronic, and procedural safeguards that comply with applicable standards to protect its clients’ nonpublic personal information (“information”). Through this policy and its underlying procedures, Thayer attempts to secure the confidentiality of client records and information and protect against anticipated threats or hazards to the security or integrity of client records and information.

It is the policy of Thayer to restrict access to all current and former clients’ information (*i.e.*, information and records pertaining to personal background, investment objectives, financial situation, tax information/returns, investment holdings, account numbers, account balances, etc.) to those employees and affiliated/nonaffiliated entities who need to know that information in order to provide products or services to the client. Thayer may disclose the client’s information if Thayer is: (1) previously authorized to disclose the information to individuals and/or entities not affiliated with the firm, including, but not limited to the client’s other professional advisors and/or service providers (*i.e.*, attorney, accountant, insurance agent, broker-dealer, investment adviser, account custodian, etc.); (2) required to do so by judicial or regulatory process; or (3) otherwise permitted to do so in accordance with the parameters of applicable federal and/or state privacy regulations. The disclosure of information contained in any document completed by the client for processing and/or transmittal by Thayer in order to facilitate the commencement/continuation/termination of a business relationship between the client and a nonaffiliated third party service provider (*i.e.*, broker-dealer, investment adviser, account custodian, insurance company, etc.), including information contained in any document completed and/or executed by the client for Thayer (*i.e.*, advisory agreement, client information form, etc.), shall be deemed as having been automatically authorized by the client with respect to the corresponding nonaffiliated third party service provider.

Thayer permits only authorized employees and affiliates who have agreed to comply with Thayer’s Privacy Policy to have access to client information. Employees violating Thayer’s Privacy Policy will be subject to Thayer’s disciplinary process. Additionally, whenever Thayer hires other organizations to provide services to Thayer’s clients, Thayer will require them to sign confidentiality agreements and/or the Privacy Policy.

If you have any questions regarding the above, please contact Chris Wilmerding, Chief Compliance Officer, at 617-275-5432 or jcw@ThayerPartnersllc.com.