**The Boston Family Office Website Privacy Policy** Effective Date: 2024-02-29 Last Updated: 2024-02-29

The Boston Family Office ("the Firm") is dedicated to protecting any and all personal information received from you. As part of its commitment to protecting your information and privacy, this Policy is intended to communicate what information we collect about you, how we use the information, and your rights regarding your information.

This Policy refers frequently to two primary forms of data, defined below.

**Personally Identifiable Information ("PII")** – Any information that can be used to identify an individual, either on its own accord or in combination with other forms of information. Such information includes Name, Birthdate, Social Security Number, National Insurance Number, Mailing Address, Email Address, IP Address, Telephone Number, or any other information that can be used to identify or contact an individual (physically or online).

**Usage Data** – Technical information that is collected in relation to the use of a website, such as IP addresses, browser type, browser version, the pages you visit, the time and date of your visit, time spent on those pages, and unique device identifiers (including both computers and mobile devices). This information is usually collected by the website hosting provider and is primarily used for analytics.

# Personal Data the Firm Collects from You on this Website

The Boston Family Office does not collect PII on its website.

Current clients of the Firm will have their personal information stored and processed as necessary by the Firm's third-party custodians as opposed to this website. An explanation of this data use and your rights surrounding your data is described within the Privacy Notice sent to you by the Firm. For how the custodians collect and process your data, please refer to their respective Privacy Policy pages.

In the event the Firm deems it necessary to collect your personal information on this website, this will be communicated to you via an updated form of this Policy.

# Usage Data the Firm Collects from You on this Website

Usage data is automatically collected when you access the Firm's website. Usage data may include information such as your IP, browser type, browser version, the pages you visit, the time and date of your visit, time spent on those pages, and unique device identifiers (including both computers and mobile devices). The Firm's website does not honor Do Not Track (DNT) requests.

#### Use of Your Data

The Boston Family Office does not collect or utilize your PII on its website.

Usage data collected by the website is used for analytics purposes in a manner that is not used to identify You. Usage data may also be used to respond to any untoward activity performed against the Firm's website (i.e., blocking an IP address used to conduct a Denial of Service (DoS) attack on the website).

# Data Protection

Data collected by the Boston Family Office is protected in accordance with the Firm's Written Information Security Policy (WISP). The Firm's WISP describes the administrative, physical, and technical safeguards in place to protect any data you have supplied to the Firm.

Please contact the Chief Compliance Officer, Darren Beals, at <u>darrenb@bosfam.com</u> for more information regarding how the Boston Family Office protects your data.

# Disclosure of Your Data

Under certain circumstances, the Boston Family Office may be required to disclose your data if required to do so by law or in response to valid requests by public authorities. The Firm may also disclose your data in good faith belief that such disclosure is necessary to comply with legal or regulatory requirements.

Data collected and disclosed in relation to the Firm's advising services is described in the Privacy Notice.

Beyond such requirements, the Firm does not share or disclose your data to any other third party.

# Your Data Rights

At any time, You may make any of the following requests regarding the Firm's collection and use of your data:

- What data has the Firm collected about you
- How your data is utilized by the Firm, including the use of your data for any automated decision-making
- Request a change or correction to your data
- Request to delete your data from the Firm's systems

All requests to exercise your data rights should be made to the Chief Compliance Officer via email at <u>darrenb@bosfam.com</u>.

Please note, while you have the above rights in regards to your data, the Firm may need to delay action on or deny your request depending on the Firm's legal or regulatory requirements (such as if your data is being utilized as part of a law enforcement investigation). Any need to delay action on or deny your request will be communicated to you.

# Changes to this Privacy Policy

The Boston Family Office reserves the right to change this Privacy Policy at any time. Changes to the Privacy Policy will be communicated on the Firm's website.

Questions, comments, or concerns about this Privacy Policy may directed to the Chief Compliance Officer via email at <u>darrenb@bosfam.com</u>.