



Essex Investment Management Co., LLC

Privacy Notice

Essex Investment Management Co., LLC respects your right to privacy. Your privacy is important to us, and maintaining your trust and confidence is one of our highest priorities. We continue to be committed to secure the confidentiality and integrity of your personal information. We are proud of our privacy practices and want our current and prospective customers to understand what information we collect and how we use it.

Why We Collect Your Information

We gather information about you and your accounts so that we can (i) know who you are, (ii) provide services to you, (iii) design and improve the services we offer, and (iv) comply with the laws and regulations that govern us. In providing financial services to you we collect certain non-public personal information about you. Our policy is to keep this information 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.

Information We Collect About You

The non-public personal information we may have about you includes what you provide to us when opening an account or communicate with us. We may collect the following types of non-public personal information about you:

- Information about your identity, such as your name, address and social security number;
- Information about your transactions with us, the custodian of your account or others;
- Information we may receive from you such as your birth date, net worth, income, family members, estate plan or other personal information.

Sources of your Information

We collect nonpublic personal information about you from the following sources:

- Information we receive from you on applications, in meetings, or through letters, e-mails or phone calls;
- Information about transactions in your accounts, and
- If you visit our web site, information we collect via a web server, often referred to as a "cookie." Cookies indicate where a site visitor has been online and what has been viewed.

Information We Disclose

We do not disclose any nonpublic personal information about our customers or former customers to anyone, except as permitted by law. Moreover, we will not release information about our customers or former customers unless one of the following conditions is met:

- We receive your prior written consent.
- We believe the recipient to be you or your authorized representative.
- We are sharing the information for the purpose of providing service to your account, but only to parties who have adopted comparable policies and safeguards for your personal information.
- We are required by law to release the information to the recipient.

We only use information about you and your account to help us better serve your investment needs or to suggest services or educational materials that may be of interest to you.

Safeguards - Confidentiality & Security

Essex Investment Management Co., LLC maintains physical, electronic and procedural safeguards that we believe are reasonably designed to protect the security and confidentiality of your information.

These include confidentiality and information security guarantees in our agreements with companies we hire to help us provide services to you, controlled user access to our computer files and strict confidentiality policies that apply to all personnel. We will continue to adhere to the privacy policies and practices described in this notice even after your account is closed or becomes inactive.