



## **Privacy Notice**

Leeward Investments, LLC (“Leeward”) considers Customer privacy to be fundamental to our relationship with you. We are committed to maintaining the confidentiality, integrity, and security of your personal information. It is therefore our policy to respect the privacy of current and former Customers and to protect personal information entrusted to us. We have established internal policies to protect your information, while allowing us to serve your needs.

### **Why Are You Receiving This Notice?**

This notice describes Leeward’s privacy policy concerning our handling of your personal information. You are receiving this privacy notice because you are either a Customer of Leeward, or are considering becoming our Customer. The term “Customer” refers to clients of Leeward who are individuals and certain trusts. We must provide this notice explaining our privacy policy when a Customer opens an advisory account with us. We must also provide a written notice, annually, to reflect any material change to our privacy policy.

The additional notice attached as Annex A applies only to California Customers and others California residents.

### **Safeguarding Privacy**

Leeward maintains strict policies and procedures to protect your personal information. We restrict access to your information to our employees and marketing representatives who require it to provide you with our services. We maintain physical, electronic and procedural safeguards to protect your personal information. We treat the information we gather about you in a confidential manner.

### **Collecting Your Information**

As part of our relationship with you, we may collect non-public personal or financial information directly from you or from other sources. We also collect information from account opening documents or other forms. These may include your transactions with Leeward, marketing representatives, financial representatives, brokers, and financial institutions.

Information collected may include:

- Personal information, such as your name and address, phone number, e-mail address and social security number

- Financial information, such as your income, assets and goals
- Information about your account or investment with us, such as your account holdings and transaction history

### **Sharing Your Information**

As part of servicing or maintaining our relationship with you and for other legally permitted or required purposes or as requested by any governmental agency or authority or to the extent reasonably necessary to prevent fraud and unauthorized transactions, Leeward may disclose your non-public personal and financial information, if applicable. This may include providing such information to service providers working with us to complete a transaction, to your custodian or consultant, and to your marketing representative, financial representative, broker or financial institution, to service your account or investment.

Unless specifically authorized in writing, we do not share your personal information with other companies not affiliated with us or engaged by us for marketing purposes. To further illustrate our commitment to our Customers, we will not share personal information unless you request or consent to the sharing (“opt-in”).

Even after your account with Leeward has terminated, we will continue to protect your personal information and only share that information as permitted and required by law.

### **Who We Are**

For the purposes of this notice, Leeward Investments, LLC (“Leeward”) is an investment adviser registered with the Securities and Exchange Commission (“SEC”) with its office located in Boston, Massachusetts. Please direct any questions related to these Policies and Procedures to [compliance@leewardinvest.com](mailto:compliance@leewardinvest.com) or contact us in writing to:

Leeward Investments, LLC  
Attn: Compliance Office  
One Boston Place  
201 Washington Street, 29<sup>th</sup> Floor  
Boston, MA 02108

Last amended: December 2021

This Privacy Notice for California Residents supplements Leeward’s general Privacy Notice and applies only to Customers and others who reside in California (“consumers” or “you”). Leeward adopts this notice to comply with the California Consumer Privacy Act of 2018 (“CCPA”) and any terms defined in the CCPA have the same meaning when used in this notice.

Information We Collect

We collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household (“personal information”). Personal information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA’s scope, like personal information covered by certain other privacy laws including the Gramm-Leach-Bliley Act.

In particular, we have collected the following categories of personal information from consumers within the last 12 months:

<u>Category</u>	<u>Examples (not all examples apply to Leeward’s business or are collected by Leeward)</u>	<u>Collected</u>
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver’s license number, passport number, or other similar identifiers.	Yes
B. Personal information categories listed in the California Customer Records statute.	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.	Yes
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	Yes
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	Yes

E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	No
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	No
G. Geolocation data.	Physical location or movements.	No
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	No
I. Professional or employment-related information.	Current or past job history or performance evaluations.	Yes
J. Non-public education information (per the Family Educational Rights and Privacy Act).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	No
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	Yes

In general, we obtain the categories of personal information listed above from the following categories of sources directly from you, or indirectly from your financial advisor. For example, from forms or agreements you complete or products and services you purchase.

#### Use of Personal Information

Leeward may use or disclose the personal information it collects for one or more of the following purposes:

- To offer and provide investment management services.
- To create, maintain, customize, and secure any account you have with us.
- To process your transactions and avoid transactional fraud.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as

part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about our consumers is among the assets transferred.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

### Sharing Personal Information

We may disclose your personal information to a third party for a business purpose. When we do so, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

We share your personal information with the following categories of third parties:

- Service providers (such as brokers, custodians and other financial institutions, other investment or financial advisers and representatives).
- Customer relationship management companies hired by us (such as Salesforce).
- Portfolio analytics companies hired by us (such as FactSet).

Disclosures of Personal Information for a Business Purpose. In the preceding twelve (12) months, we may have disclosed the following categories of personal information for a business purpose:

Category A: Identifiers.

Category B: California Customer Records personal information categories.

Category C: Protected classification characteristics under California or federal law.

Category D: Commercial information.

Category I: Professional or employment-related information.

Category K: Inferences drawn from other personal information.

We disclose your personal information for a business purpose to the following categories of third parties:

- Service providers (such as brokers, custodians and other financial institutions, other investment or financial advisers and representatives).
- Customer relationship management companies hired by us (such as Salesforce).
- Portfolio analytics companies hired by us (such as FactSet).

**Leeward does not sell your personal information.**

## Your Rights and Choices

The CCPA provides California residents with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

Access to Specific Information and Data Portability Rights. You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request (see “Exercising Access, Data Portability, and Deletion Rights” below), we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Leeward’s business or commercial purpose for collecting that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we disclosed your personal information for a business purpose, a list of such disclosures identifying the personal information categories that each category of recipient obtained.
- If we sold your personal information, a list of such sales identifying the personal information categories that each category of recipient purchased. (This provision would apply only if we changed our policy of not selling your personal information, updated this notice accordingly and posted the updated notice on our website.)

Deletion Request Rights. You have the right to request that Leeward delete any of your personal information that Leeward collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request (see “Exercising Access, Data Portability, and Deletion Rights” below), Leeward will delete (and direct its service providers to delete) your personal information from Leeward’s records, unless an exception applies.

Leeward may deny your deletion request if retaining the information is necessary for Leeward or its service provider(s) to:

- Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act.
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the

information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.

- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Exercising Access, Data Portability, and Deletion Rights. To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by either:

- Calling us at (617) 468-6700
- Emailing us at [compliance@leewardinvest.com](mailto:compliance@leewardinvest.com).

Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative; and
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

Making a verifiable consumer request does not require you to create an account with us.

We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

For instructions on exercising sale opt-out rights, see "Personal Information Sales Opt-Out and Opt-In Rights" below.

Response Timing and Format. We will try to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 45 days), we will inform you of the reason and extension period in writing.

If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we

cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

#### Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

#### Changes to This Privacy Notice

We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will post the updated notice on our website and update the notice's effective date. Your continued use of our website following the posting of changes constitutes your acceptance of such changes.

#### Contact Information

If you have any questions or comments about this notice, the ways in which Leeward collects and uses your information, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Phone: (617) 468-6700  
Email: [compliance@leewardinvest.com](mailto:compliance@leewardinvest.com)  
Postal Address:  
Leeward Investments, LLC  
Attn: Compliance Office  
One Boston Place  
201 Washington Street, 29<sup>th</sup> Floor  
Boston, MA 02108