

# NORTHEAST INVESTMENT MANAGEMENT, INC.

## *INVESTMENT ADVISORS AND TRUSTEES*

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## PRIVACY POLICY

### OUR COMMITMENT TO YOU

At Northeast Investment Management, Inc., we recognize and respect the privacy of our clients and are committed to safeguarding your personal information. We consider your nonpublic personal information to be private and confidential. We understand that you have entrusted us with your private information and our professional reputation has been built on maintaining that trust.

This Privacy Policy is designed to help you understand how we collect, use, and safeguard the personal information you provide to us and describe steps you can take to protect yourself and your identity. We reserve the right to modify this Privacy Policy at any time.

### INFORMATION WE COLLECT

Northeast collects, retains and uses client information for the purpose of establishing you as a client, administering our operations, providing effective client service, and complying with legal and regulatory requirements. This may include – but is not limited to – your name, address, email, phone number, driver's license number, date of birth and Social Security or taxpayer identification number. We may also collect account information such as custody or brokerage account balances and investment activity. This information is critical in completing account applications and forms in addition to maintaining profile and suitability documents needed to service your account.

### HOW WE MAY SHARE YOUR INFORMATION

Northeast does not sell, exchange or share client information with outside organizations unless the third party is essential in administering our operations. We do not provide your information to mailing list vendors or solicitors or share such information with non-affiliates for marketing purposes. We do not engage in joint marketing. Other than the conditions explained in INFORMATION WE COLLECT above, we do not reveal nonpublic personal information to unaffiliated third parties unless:

- The client requests it.
- The information is required by law such as a subpoena or court order to produce records regarding the client's account. In such instances, information provided is limited to that required by the specific law.
- The information is required by an auditor or examiner for the purpose of completing an audit or regulatory examination.
- The information is necessary to provide agreed upon services to you by a third party who is under agreement with us such as broker-dealers, custodians, investment management and tax preparation software providers and class action litigation researchers.
- Your name-and-address *only* is shared with third party providers who print and mail firm-wide communications such as our annual ADV offering and this Privacy Policy.

## SECURITY

Northeast maintains physical, procedural and electronic security measures to safeguard your personal information from unauthorized access and use. These include such safeguards as secure passwords, dual-authentication, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are regularly trained and tested on their responsibilities to protect your personal information. We require third parties that assist in providing our services to you to protect the personal information they receive from us. We contract with an independent auditor to conduct a review of the operational effectiveness of our controls, including an attestation that logical access to programs, data, key applications and computer resources is restricted to authorized users and such users are restricted to performing authorized actions. Those controls are rigorously tested against standards set forth by the AICPA. This is known as a SOC1 Type 2 report.

## YOUR ROLE

We make every effort to maintain the most up to date, complete and accurate client and account information. If you believe any information is inaccurate, call us at (617) 523-3588. We will investigate the problem and, if necessary, take appropriate action quickly and according to industry practices and applicable law. We do not manage any content, advertising, products, services, or other materials appearing on or available from third party websites or for any privacy or other practices of the parties operating those websites. We therefore recommend you read and understand the privacy notice of any third-party website before you provide them any information.

## PHISHING SCAMS

Technology has improved the way we do business, but it has also made it easier for scammers to trick you into giving them your personal information. Identify theft, wire fraud, check forgeries and other types of fraud are common, disruptive and costly. Scammers will try to steal your login information, passwords and account numbers. If they get that information, they could gain access to your email, bank, or other accounts. Scammers launch thousands of phishing attacks like these every day — and they're often successful.

Phishing emails and text messages may look like they're from a company you know or trust. They may look like they're from a bank, a credit card company, a social networking site, an online payment website or app or an online store.

Be on the lookout for emails and text messages designed to trick you into clicking on a link or opening an attachment. The messages they send often say:

- You must confirm personal information such as your Social Security Number
- You must click on a link in order to make a payment
- You are eligible to register for a government refund
- You are eligible for a coupon for free stuff
- There has been suspicious activity or multiple log-in attempts on your account
- There is a problem with payment information on your account

Some hackers may include a fake invoice that appears to be from a source with whom you are familiar. You should contact the source to confirm that the invoice is legitimate.

Lastly, if you receive an email from anyone purporting to be from Northeast that asks you to provide personal or account information, do not provide such information. Contact us immediately at (617) 523-3588.