Online Privacy Statement - The Bulfinch Group

Effective Date: 9/1/ 2019.

The Bulfinch Group Online Privacy Statement

The Bulfinch Group, an agency of The Guardian Life Insurance Company of America *© 2019* , may also be referred as "Bulfinch Group", "Bulfinch" or "Agency". The Online Privacy Statement and Online Terms and Conditions for Use are limited to those applicable sites for which the agency has primary supervisory responsibilities, including its related DBAs, its Landing Pages, and Calendar Booking sites. For the purposes of these, the following is our Online Privacy Statement.

The Bulfinch Group understands that you care about how we collect, use, and share information when you interact with our websites, online services, and applications (our "Sites"). We value the trust you place in us. This Online Privacy Statement (the "Privacy Statement" or the "Statement" or the "OPS") explains:

• the types of information we collect about you through our websites, online services and mobile applications (our "Sites") as well as from third party sources on and offline;

• how we use and protect that information;
• the types of information we may share with others and under what circumstances; and
• the choices you have regarding our collection, use, and sharing practices.

Important Disclosures below:
All investments contain risk and may lose value. Diversification does not guarantee profit or protect against market loss.

Investors should consider the investment objectives, risks, charges and expenses of mutual funds carefully before investing. This and other information are contained in the fund's prospectus, which may be obtained from your investment professional. Please read it before you invest or send money. Investments in mutual funds are subject to risk, including possible loss of the principal amount invested.

PAS is a wholly-owned subsidiary of Guardian and a member FINRA, SIPC

Mutual Funds Disclosure for PAS

Introduction

This Online Privacy Statement applies to your use of any of The Bulfinch Group, The Guardian Life Insurance Company of America's ("Guardian") online interfaces (*e.g.,* websites, applications, or online services) and any Guardian U.S. affiliate or subsidiary online interface that links to them, (collectively, the "Sites"), including any content, functionality, and services offered on or through the Sites, regardless of how you access the Sites.
The term "Guardian" includes its parents, subsidiaries, affiliates, predecessors, successors, and assigns.

When used in these Terms, "we" and "our" mean Guardian and "you" and "your" refer to any individual, company, or legal entity that accesses or otherwise uses the Sites. Words importing the singular number include the plural and vice versa.

We reserve the right to modify or amend these Terms from time to time with or without prior notice. Your accessing and continued use of our Sites following the posting of changes to these Terms will mean you accept those changes. You should review these Terms from time to time to be aware of any changes that are made. These Terms constitute a binding agreement between you and Guardian.

If you do not agree to these Terms and Online Policy Statement, please do not use the Sites.

When This Privacy Statement Applies

This Privacy Statement applies to any Site that links to it, as well as the information we collect when you interact with us through social media or other websites and online services, as well as to information that we collect offline but combine with information collected on our Sites. It does not apply to non-Bulfinch Group related websites and mobile applications that may link to or be linked from our Sites. Please review the privacy policies on those websites and applications directly to understand their privacy practices. This Privacy Statement does not apply to "nonpublic personal information," such as investment account information, or "protected health information," such as medical records, even if we collect such information through our Sites. For information about our privacy practices with respect to those types of information, please refer to The Guardian Customer Privacy Policy and Guardian's HIPAA Notice of Privacy Practices.

We may make changes to this Privacy Statement from time to time. We will post any changes accordingly as required. Such changes will become effective when they are

posted. Your continued use of our Sites following the posting of any changes will mean you accept those changes.

Information We Collect From or About You

Below we describe the different types of information we may collect from you, including from the devices you use, when you interact with our Sites.

Information You Give Us: Some of our Sites may include features or services that permit you to enter contact information and other information about you. We collect and store any information you enter on our Guardian Approved Sites. This may include your name, mailing address, ZIP code, phone number, or email address. This information may also include information you provide during a registration/sign-up process, including account numbers or other identifiers needed to link your online account with a Guardian or related investment product.
Information Collected Automatically: When you interact with our Sites, certain information is automatically collected. This information includes computer and connection information, such as statistics on your page views, traffic to and from our Sites, referral URL, ad data, your IP address, and device identifiers. This information also may include your transaction history, and your web log information, how you search for our Sites, the websites you click on from our Sites or emails, whether and when you open our emails, and your browsing activities across other websites.
Much of this information is collected through cookies, web beacons, and other tracking technologies, as well as through your web browser or device (e.g., IP address, MAC address, browser version, etc.). Most web browsers automatically accept cookies but, if you prefer, you can usually modify your browser setting to disable or reject cookies. If you delete your cookies or if you set your browser to decline cookies, some features of our Sites may not be available, work, or work as designed.

Location Information: When you interact with our Sites, we may collect information about your location and your device. Some of this information may be general, such as the state or city associated with your zip code, while some of this information may be more precise, such as information associated with your mobile device. Location information allows us to provide location- based services such as showing you nearby financial advisors. Most mobile devices allow you to control or disable the use of precise location services globally or per application in the device's settings menu.
Information from Social Media and Third Party Services: When you connect to, authenticate through, or interact with us or our Sites using a social media platform (such as by clicking on a social media icon linked from our Sites) or third party service (such as a Google account), we may collect information, including personal information, available through the service or the service's application programming interfaces (APIs). This information may include your name, account ID or username, contact details, email address(es), information related to your contacts, calendars, location information, profile picture, the contents of your posts or other communications, and other information the platform or third-party service makes available. If you choose to log in to your account with or through a social networking

service or third-party service, we and that service may share certain information about you and your activities. You should check your privacy settings on these platforms and third party services to understand what information is made available to us, and you may be able to change the settings for these platforms or services to prevent, limit or otherwise control the information made available to us.

How We Use Information We Collect From or About You

We may use information you give us or information we collect about you to:

- Communicate with you, including to respond to your inquiries and fulfill your requests;
- Provide, maintain, personalize, optimize, and improve our Sites, including research and analytics regarding use of our Sites, social media platforms and third party services, or to remember you when you leave and return to our Sites;
- Provide and improve our products and services, including to provide you with online financial or health-related tools, to process any transactions you request, or to authenticate your identity;
- Deliver advertising, including interest-based advertising on our Sites and other websites and applications; and
- Detect, investigate, and prevent activities that may violate our policies or be fraudulent or illegal.

We may combine information from our Sites together and with other information we obtain from our business records, including your use of Guardian and affiliated company products, services, websites and applications. We also may use or combine information that we collect from our Sites with information we obtain from third parties, including demographic information and other attributes, such as census data, purchasing data, demonstrated interests (for example, an interest in travel), loyalty programs, organizational affiliations and customer lists. Additionally, information collected from a particular browser or device may be used with another computer or device that is linked to the browser or device on which such information was collected.

We may use information we collect from or about you to create aggregated or de-identified data that does not identify you. Once the data is aggregated or de-identified, we may use it for any purpose, and we may share it with third parties for their own uses.

Interest-Based Advertising

The Bulfinch Group as well as Guardian affiliates and subsidiaries use the information you make available to us when you interact with our Sites to provide you with advertising and offers that are more relevant to you. We partner with third party advertising companies to provide advertisements on our Sites, as well as on other websites and applications about our products and services that may be of interest to

you. Some of our Sites may also include advertisements for unaffiliated products and services. The advertisements you see may be based on information collected through cookies, web beacons and other tracking technologies from our Sites and on other third-party websites you visit and mobile applications you use that participate in our advertising networks. These third parties may use persistent identifiers to track your Internet usage across other websites and mobile applications in their networks beyond our Sites. While The Bulfinch Group will not share information that personally identifies you with unaffiliated third parties for their own uses, such third parties may, with sufficient data from other sources, be able to personally identify you.

You can learn more about ad serving companies and the options available to limit their collection and use of your information by visiting the websites for the Network Advertising Initiative and the Digital Advertising Alliance and the webpages for Facebook's ad preferences tool and privacy policy. Similarly, you can learn about your options to opt-out of mobile app tracking by certain advertising networks through your device settings and by resetting the advertiser ID on your Apple or Android device. For more information about how to change these settings go to:
Apple: http://support.apple.com/kb/HT4228 Android: http://www.google.com/policies/technologies/ads/
Windows: http://choice.microsoft.com/en-US/opt-out
Please note that opting-out of advertising networks services does not mean that you will not receive advertising while using our Sites or on other websites, nor will it prevent the receipt of interest- based advertising from third parties that do not participate in these programs. It will, however, exclude you from interest-based advertising conducted through participating networks, as provided by their policies and choice mechanisms. If you delete your cookies, you may also delete your opt- out preferences.

We may use third parties to provide analytics services about your use and interaction of our sites, including Google Analytics, a web analytics service provided by Google, Inc. Google Analytics and our other third party service providers and partners use cookies or other tracking technologies to help us analyze how users interact with and use our Sites, compile reports on our Sites' activity, and provide other services related to our Sites' activity and usage. The technologies used by these third parties may collect information such as your IP address, time of visit, whether you are a return visitor, and any referring website. Our Sites do not use Google Analytics or other third party services to gather information that personally identifies you. The information generated by Google Analytics will be transmitted to and stored by Google and will be subject to Google's privacy policies. To learn more about Google's partner services and to learn how to opt out of tracking of analytics by Google, click here.
Your browser or device may include "Do Not Track" functionality. At this time, The Bulfinch Group and Guardian do not respond to browser "Do Not Track" signals.

How We Share Information About You

We may share your information:

- With companies who work on our behalf to help us provide and support our Sites and our products and services. We require these service providers to treat all information we provide as confidential and to use it only for providing the services for which they have been engaged.
- Within The Bulfinch Group and Guardian family of affiliate companies to provide you products and services, as well to send you information about other products and services we think you may be interested in.
- With The Bulfinch Group and Guardian agents or financial advisors that sell and manage Guardian and other approved products so that they may communicate with you about our products and services, as well as to deliver marketing communications, including emails, newsletters, offers tailored to you, and other materials that they believe may be of interest to you.

We may change our ownership or corporate organization. We may transfer to another entity or its affiliates or service providers some or all of the information we hold about you in connection with, or during negotiations of, any merger, acquisition, sale of assets or any line of business, change in ownership control, or financing transaction. We cannot promise that an acquiring party or the merged entity will have the same privacy practices or treat your information the same as described in the Privacy Statement.

We may use or disclose information about you if required to do so by law or on the good-faith believe that such sharing is necessary to (a) conform to applicable law or comply with legal process served on us or our Sites; (b) protect and defend our rights or property, our Sites, or our users; or (c) act to protect the personal safety of our employees and agents, other users of our Sites, or members of the public.

Updating Your Information

If you have an account with us, you can update your information or adjust your contact and marketing preferences by logging in to your online account. You may also contact your account representative or financial advisor to update information related to the accounts they manage.

How We Secure the Information We Collect From or About You

We use a combination of physical, technical, and administrative safeguards to protect the information we collect through our Sites. While we use these precautions to safeguard your personal information, we cannot guarantee the security of the networks, systems, servers, devices, and databases we operate or that are operated on our behalf.

Biometric information

We may collect information from you about your physical characteristics (e.g., voiceprints, scans of face geometry) to create biometric identifiers, which we may use to identify and authenticate you, including to detect, investigate, and prevent activities that may violate our policies or be fraudulent or illegal, and to administer your account and maintain account-related records. We will obtain your consent before your information is used to create a biometric identifier. We may use third party service providers or disclose information as required by law or as otherwise specified in this privacy policy. However, we will not disclose your biometric identifiers to any third parties for their own use. We will protect your biometric information with the same security standards that we use to protect your highly sensitive personal information. We will retain your biometric information for as long as necessary for the purposes identified above, you have consented, and as required by applicable law.

Other Important Information

Aggregation Websites: Other companies offer websites and services that allow you to consolidate account information from multiple sources. To do this, those companies might ask you for your Guardian or affiliated company or other related account credentials. The Bulfinch Group, Guardian, Guardian affiliates and its subsidiaries are not responsible for your use of such websites and services.
If you provide account credentials or other details about your accounts to such website or services, The Bulfinch Group, Guardian affiliates, and its subsidiaries will consider that you have authorized the website or service to access your Guardian, Guardian affiliated, and its subsidiary's account information. If you decide to revoke the authority you have given to an aggregation website or service, we strongly recommend that you change your password for the Sites to ensure that your accounts are inaccessible to the aggregation website or service.

Users Outside of the United States: If you use our Sites outside of the United States, you understand and consent to the transfer of information about you, and the collection, processing, and storage of information about you, in the United States and elsewhere. The laws in the U.S. and these countries regarding personal information may be different than the laws of your state or country.

For Questions, or to Report a Problem

For questions about our privacy practices, contact us via email at privacy_office@glic.com.