

# F.L.Putnam Investment Management Company Inc.

## Privacy Policy

FACTS	What does FLP do with your personal information?
<b>Why?</b>	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
<b>What?</b>	The types of personal information we collect and share depend on the product or service you have with us. This information can include: <ul style="list-style-type: none"> <li>- Social Security Number, identity information;</li> <li>- Address, telephone number, email address;</li> <li>- Brokerage accounts and account holdings, balances, security; transactions and investment objectives, and fee payment history; and</li> <li>- Financial and family background, net worth, and income.</li> </ul>
<b>How?</b>	All financial companies need to share client personal information to run their everyday business. In the section below, we list the reasons financial companies can share their client personal information, the reasons FLP chooses to share, and whether you can limit this sharing.

Reasons we can share your personal information	Does FLP share with third parties?	Can you limit this sharing?
<b>For our everyday business purposes</b> —such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
<b>For our marketing purposes</b> —to offer our products and services to you	Yes	No
<b>For joint marketing with other financial companies</b>	No	N/A
<b>For our affiliates' everyday business purposes</b> —information about your transactions and experiences	Yes	Yes
<b>For our affiliates' everyday business purposes</b> —information about your creditworthiness	No	N/A
<b>For our affiliates to market to you</b>	Yes	Yes
<b>For nonaffiliates to market to you</b>	No	N/A

<b>To limit our sharing</b>	Call us 800-344-3435 or email us at <a href="mailto:flputnam@flputnam.com">flputnam@flputnam.com</a>  <u>Please note:</u> If you are a new customer, we can begin sharing your information immediately in order for us to begin the account set-up process. When you are no longer our customer, we continue to share your information as described in this notice.  However, you can contact us at any time to limit our sharing.
<b>Questions?</b>	Call 800-344-3435 or email us at <a href="mailto:flputnam@flputnam.com">flputnam@flputnam.com</a>

<b>Who is providing this notice?</b>	<b>F.L.Putnam Investment Management Company ("FLP")</b>
<b>How does FLP protect my personal information?</b>	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings. We restrict access to your non-public information to those employees and vendors who need to know that information to service your account.
<b>How does FLP collect my personal information?</b>	We collect your personal information, for example, when you: <ul style="list-style-type: none"> <li>• sign our advisory agreement,</li> <li>• open a brokerage/custodial account,</li> <li>• communicate with us,</li> <li>• purchase or sell securities,</li> <li>• deposit or withdraw funds,</li> <li>• provide or update your investment profile,</li> <li>• instruct your broker, custodian, or bank to forward your statements to us or grant us access to your statements.</li> </ul>
<b>Why can't I limit all sharing?</b>	Federal law gives you the right to limit only: <ul style="list-style-type: none"> <li>• sharing for affiliates' everyday business purposes—information about your creditworthiness</li> <li>• affiliates from using your information to market to you</li> <li>• sharing for nonaffiliates to market to you</li> </ul> State laws and individual companies may give you additional rights to limit sharing.
<b>What happens when I limit sharing for an account I hold jointly with someone else?</b>	Your choices apply to everyone on your account.
<b>What about SMS / text messaging?</b>	FLP will not attempt to solicit your business through any text messaging campaigns. We will contact you via text message if it is convenient for you. If you would prefer not to receive text messages from us, you may opt out of this service at any time. Information obtained as part of the SMS consent process will not be shared with third parties. If you have consented to receive text messages from FLP, you may receive text messages related to FLP. Below are some examples: <ul style="list-style-type: none"> <li>- information about the services FLP provides</li> <li>- information about the servicing of your account</li> </ul> Standard Messaging Disclosures <ul style="list-style-type: none"> <li>- Message and data rates may apply.</li> <li>- Message frequency may vary.</li> <li>- You can opt-out at any time by texting "STOP."</li> <li>- For assistance, text "HELP" or visit <a href="https://flputnam.com/contact/">https://flputnam.com/contact/</a></li> </ul>
<b>Definitions</b>	
<i>Affiliates</i>	Companies related by common ownership or control. They can be financial and non-financial companies. <b>FLP's affiliates include F.L. Putnam Securities Company and Darwin Trust Company of New Hampshire, LLC, a New Hampshire Chartered Trust Company.</b>
<i>Nonaffiliates</i>	Companies not related by common ownership or control. They can be financial and nonfinancial companies. Nonaffiliates we share with can include broker-dealers, consultants, and auditors.
<i>Joint marketing</i>	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. <b>FLP has not entered into any joint marketing agreements.</b>