

# **NorthStar Asset Management LLC**

## **Privacy Policy**

At NorthStar our most important asset is our relationship with our clients who have entrusted us with their financial affairs. We are committed to safeguarding the privacy of information we maintain about our clients. There are certain times when, conducting our business, we may find it necessary to disclose categories of nonpublic information about our clients as permitted by law.

### **Why and How We Collect Personal Information**

To: Help us evaluate client financial needs; process client requests and transactions; inform clients about products and services that may be of interest and provide them with effective and efficient customer service.

We collect information from a variety of sources, including: account applications and other forms that client submit to us, which provide categories of non public information such as name, address, e-mail address, telephone number, date of birth, Social Security number or other tax identification number, occupation, financial goals, assets and income.

### **Who Has Access to Personal Information**

Only those employees who need to have access to personal information to perform their jobs are authorized to use this personal information. They may need access to personal information to conduct business on your behalf, service your account, help you and your Financial Advisor pursue your financial objectives, and to conduct our business.

Categories of nonpublic information may be shared only with banks and brokers acting as custodian for your securities and with whom we have written current

agreement. Only in the event of a request from a government agency or regulator in compliance with a subpoena, fraud prevention or other criminal activity is nonpublic information provided for both current and former clients.

### **How We Protect Personal Information**

Employees who have access to client personal information are required to maintain and protect the confidentiality of that information and must follow established procedures. We maintain physical, electronic and procedural safeguards to protect client personal information to comply with applicable laws and regulations. Within NorthStar client personal data is be transmitted and stored in a protected environment (e.g. firewalls).

### **Why and How We Share Information With Nonaffiliated Third Parties**

We may share client personal information (as described above in “Why and How We Collect Personal Information”) with companies that we hire to perform services for us, such as vendors that provide data processing, computer software maintenance and development, transaction processing and marketing services. We undertake to take all reasonable steps in order not to allow client personal data to be seen by any third parties other than those which have been engaged by NorthStar to provide services to you. We will only disclose client data to other third parties, if compelled to do so for legal or regulatory purposes. We use security devices to ensure the safety of information we collect to guard against unauthorized access.