

PRIVACY POLICY: OUR COMMITMENT TO PRIVACY

NorthStar Asset Management, Inc. is committed to maintaining the confidentiality, integrity and security of personal information about our current, prospective and former clients. We consider privacy to be fundamental to our relationships with clients. This policy describes the steps we have taken to safeguard your information and what client information we may share with others.

For clients, please be sure to review our privacy notice.

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.

Information We Collect

The types of personal information we collect and share can include:

- Name and contact information,
- Information regarding client transactions with us,
- A personal identifier such as, depending on the client's country of residence, a Social Security number, a National Insurance Number, a Tax File Number, etc.,
- Account balances, portfolio income, and
- Trust documents and information

Information We Disclose

When you are no longer our client, we continue to share your information as described below and in our privacy notice.

All financial companies need to share some of your personal information to run their everyday business. In the section below, we list the reasons financial companies can share your personal information; the reasons NorthStar Asset Management, Inc. chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does NorthStar Asset Management share?	Can you limit this sharing?
For our everyday business purposes— such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	YES	YES
For our marketing purposes— to offer our products and services to you	YES	YES
For joint marketing with other financial companies	NO	NA
For our affiliates' everyday business purposes—information about your transactions and experiences	YES	YES
For our affiliates' everyday business purposes—information about your creditworthiness	NO	NA
For our affiliates to market to you	NO	NA
For nonaffiliates to market to you	NO	NA

Information Security

To protect your personal information from unauthorized access and use, we use security measures that comply with federal and state laws. These measures include computer safeguards and secured files and buildings, and confidentiality training of employees.

Opting in / Opting Out

We collect your personal information, for example, when you open your account with us, or when you contact us to update your contact information.

Federal law gives you the right to limit only

- Sharing for affiliates' everyday business purposes— information about your creditworthiness
- · Affiliates from using your information to market to you
- Sharing for nonaffiliates to market to you

State laws and individual companies may give you additional rights to limit sharing.

Under no circumstances does NorthStar Asset Management, Inc. sell our clients' names or other information to anyone.

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