



Investment Management & Accounting Services

27 County Way
Beverly, MA 01915
(978) 922-0435

PRIVACY NOTICE

We value the trust our clients have placed in us and are committed to the responsible management, use, and protection of their personal information. Please take a moment to review this Privacy Notice to learn how we protect your information and use it to service your account(s).

Information We Collect From You

Eddy Company, LLC collects personal information about its customers to help it serve their financial needs, process transactions in their account(s), provide customer service, offer new products or services, and fulfill legal and regulatory requirements. Eddy Company, LLC collects information about its customers from the following sources:

- information provided to us or our investment advisor representatives by our customers (such as on account applications and related forms, in discussions with our employees and advisor representatives, or through our website).
- information gathered from our internal files regarding the customer's transaction history with us (such as account balances, trading history, and payment history), as well as that provided by the qualified custodian that holds your account.
- information provided, with your authorization, by other unaffiliated third parties, including employers, associations, retirement plan benefit sponsors, and other institutions, if the customer transfers positions or funds to us.

This information may include "nonpublic, personal information," which means information that is not readily known or accessible in the public realm, such as the customer's social security number, birth date, net worth, assets, and income.

Sharing Information

Under Massachusetts law, clients must "opt-in" to allow us to share non-public personal information with any non-affiliated parties before any personal information is disclosed. You may opt-in to authorize us to share information with third parties by signing an Authorization to Share Information Form. This authorization may be revoked at any time by notifying us in writing.

However, we may disclose a customer's nonpublic personal information without his/her prior consent to:

- provide the services requested by the customer, including:
 - clearing, transferring, confirming, or reconciling transactions in the customer's account(s); and
 - providing statements or other records regarding the status or value of the customer's account(s);
- provide the customer with marketing materials regarding our products and/or services;
- enforce any of our rights, including the collection of any fees or other payments due;
- comply with the request or requirements of regulatory and/or law enforcement organizations;

- provide your contact information to the firm's appointed agent to carry out the firm's Business Succession Plan in the event of the death or incapacity of the firm's principal; or
- respond to a subpoena or discovery request; or provide disclosures as otherwise permitted or required by law.

We may provide such information to unaffiliated financial or non-financial services providers (such as broker-dealers, custodians, mutual fund companies, banks, investment firms, third-party administrators, clearing firms, and other third parties who assist us in providing account maintenance or customer service) as necessary pursuant to the exceptions listed above.

We do not sell, share, or disclose your nonpublic personal information to unaffiliated third-party marketing companies. We do not have any affiliated entities, and do not participate in any joint marketing arrangements.

Safeguarding Information

Eddy Company, LLC recognizes the need to prevent unauthorized access to the information we collect, including information held in electronic format. Eddy Company, LLC authorizes access to your nonpublic personal information only to personnel who need that information to serve you. We maintain physical, electronic, and procedural safeguards regarding your nonpublic, personal information to ensure that we comply with our own policy, industry practices, and federal and state regulations. If you decide to close your account(s) or become an inactive customer, we will adhere to the privacy policies and practices as described in this notice.

Questions

You do not have to contact us to benefit from our privacy protections; they apply automatically to all of our customers and former customers. If you have any questions after reading this privacy policy, we encourage you to contact your advisor or to write to Eddy Company, LLC, 151 Rantoul Street, Suite 681, Beverly, MA 01915.