



Privacy Notice

LMCG Investments, LLC (“LMCG”) considers Customer privacy to be fundamental to our relationship with you. We are committed to maintaining the confidentiality, integrity, and security of your personal information. It is therefore our policy to respect the privacy of current and former Customers and to protect personal information entrusted to us. We have established internal policies to protect your information, while allowing us to serve your needs.

Why Are You Receiving This Notice?

This notice describes LMCG’s privacy policy concerning our handling of your personal information. You are receiving this privacy notice because you are either a Customer of LMCG, or are considering becoming our Customer. The term “Customer” refers to clients of LMCG who are individuals, and certain trusts, and individuals who invest in a private fund managed by LMCG. We must provide this notice explaining our privacy policy when a Customer opens an advisory account with us or invests in a private fund managed by us. We must also provide a written notice, annually, to reflect any material change to our privacy policy.

The additional notice attached as Annex A applies only to certain EU Customers.

Safeguarding Privacy

LMCG maintains strict policies and procedures to protect your personal information. We restrict access to your information to our employees and marketing representatives who require it to provide you with our services. We maintain physical, electronic and procedural safeguards to protect your personal information. We treat the information we gather about you in a confidential manner.

Collecting Your Information

As part of our relationship with you, we may collect non-public personal or financial information directly from you or from other sources. We also collect information from applications or other forms. These may include your transactions with LMCG, marketing representatives, financial representatives, private funds, brokers, and financial institutions.

Information collected may include:

- Personal information, such as your name and address, phone number, e-mail address and social security number
- Financial information, such as your income, assets and goals
- Information about your account or investment with us, such as your account holdings and transaction history

Sharing Your Information

As part of servicing or maintaining our relationship with you and for other legally permitted or required purposes or as requested by any governmental agency or authority or to the extent reasonably necessary to prevent fraud and unauthorized transactions, LMCG may disclose your non-public personal and financial information, if applicable. This may include providing such information to service providers working with us to complete a transaction, to your custodian or consultant, and to your marketing representative, financial representative, private fund, broker or financial institution, to service your account or investment.

Unless specifically authorized in writing, we do not share your personal information with other companies not affiliated with us or engaged by us for marketing purposes. To further illustrate our commitment to our Customers, we will not share personal information with our affiliates unless you request or consent to the sharing (“opt-in”).

Even after your account with LMCG has terminated, we will continue to protect your personal information and only share that information as permitted and required by law.

Who We Are

For the purposes of this policy, “LMCG Investments, LLC” or “LMCG” includes LMCG Investments, LLC, any subsidiaries it may have from time to time, and any private investment funds managed or sponsored by any of them from time to time.

For questions concerning this policy, please contact us in writing to:

LMCG Investments, LLC
Legal and Compliance Office
200 Clarendon Street, 28th Floor
Boston, MA 02116

The European General Data Protection Regulation (the “GDPR”) applies to LMCG, as an entity without an establishment in the European Union (“EU”), when (i) LMCG “processes” (collects, records or stores) personal data (“EU Personal Data”) of Customers who are in the EU (“EU Customers”), and (ii) those processing activities are related to offering of goods or services to such EU Customers.

LMCG provides EU Customers the following information in response to the GDPR:

- LMCG is an investment adviser registered with the Securities and Exchange Commission (“SEC”), and its main business address is 200 Clarendon Street, 28th Floor, Boston, MA 02116. Please direct any questions related to these Policies and Procedures to compliance@lmcg.com.
- LMCG processes the following information about EU Customers: name, address, email address, telephone number; also LMCG may process detailed information about EU Customers who decide to engage LMCG to provide investment management services or to invest in one of LMCG’s private funds (including investment goals and objectives, identification numbers, qualifications or status required by applicable investment laws and regulations, wealth and income data, bank account and trading account details, government identification and tax forms).
- LMCG processes EU Personal Data on the basis of the "legitimate interest ground". LMCG’s legitimate interest, and purpose of its processing such data, is offering and providing investment management services and investments in its private funds, in each case typically involving performance of a contract.
- LMCG provides EU Personal Data (a) to brokers and other counterparties (typically in the United States) that need this information to effect trading by the LMCG-managed investment accounts of EU Customers and (b) to administrators and other fund service providers and fund counterparties (typically in the United States) that need information about EU Customers who invest or intend to invest in a LMCG private fund so that they may provide services to LMCG or such fund or permit investment trading by such fund.
- LMCG’s offices and personnel are in the United States and all of EU Personal Data shared with LMCG will be processed in the United States. Typically LMCG would transfer such data only within the United States as described in the preceding item.
- LMCG is subject to SEC recordkeeping requirements. Generally speaking, LMCG must retain records pertaining to a client, regardless of a client’s location, until seven years after the termination of its engagement with such client. This seven year retention period also applies to records pertaining to LMCG’s private funds (and by extension to records of investors in its private funds, regardless of their location).
- EU individuals have certain rights under the GDPR. Those rights relevant to EU Customers when LMCG processes EU Personal Data are:

- the right to be informed of processing – LMCG notifies EU Customers about its processing of EU Personal Data via this notice;
- the right of access – an EU Customer may request access to his or her information by emailing legal@lmcg.com stating that he or she is submitting a subject access request;
- the right to rectification – an EU Customer may update or amend his or her information if it is inaccurate or incomplete by emailing legal@lmcg.com requesting an update;
- the right to erasure and the right to restrict processing – an EU Customer may request the deletion of his or her information, or restrict its use, in certain circumstances (for example he or she can request that LMCG erases his or her information where the information is no longer necessary for the purpose for which it was collected, unless certain exceptions apply) by emailing legal@lmcg.com; and
- the right to object to processing – an EU Customer may object to certain uses of his or her EU Personal Data on grounds relating to his or her particular situation by emailing legal@lmcg.com.