



Privacy Policy of Frontier Capital Management Company, LLC (“Frontier”)

At Frontier we recognize that your relationship with us is based on trust and the expectation that we will always act in your best interests. Because you have entrusted us with the management of a portion of your assets, we take very seriously our obligation to protect and safeguard the privacy of your personal and financial information. What follows below is the current privacy policy for Frontier.

Information We Collect

In the course of doing business with you, we collect nonpublic personal information about you, such as:

- Information we receive from you on applications or other forms, such as social security number, income, occupation and birth date; and
- Information about your transactions with us, or others, such as account balances, assets and past transactions.

Disclosure of Information to Nonaffiliated Third Parties

We do not disclose any nonpublic personal information about our customers or former customers to any nonaffiliated third parties, except as permitted by law. In the course of servicing you, we may share some information with our service providers, such as transfer agents, custodians, broker-dealers, accountants and lawyers.

Disclosure of Information to Affiliates

We do not disclose any nonpublic personal information about our customers or former customers to any of our affiliates, except as permitted by law.

Security Standards

We restrict access to nonpublic personal information about you to those employees who need to know that information to provide products or services to you. We maintain physical, electronic, and procedural safeguards that comply with federal standards to guard your nonpublic personal information and ensure its integrity and confidentiality.

As emphasized above, it has always been and will always be Frontier’s policy never to sell information about current or former customers or their accounts to non-affiliated third parties. Nor is it Frontier’s policy to share information unless it is required to process the transaction, at the request of our customer or as required by law.