

NORTHEAST INVESTMENT MANAGEMENT, INC. PRIVACY POLICY STATEMENT

We recognize and respect the privacy of our clients and - to that end - are committed to the following:

We collect, retain and use client information for the purpose of administering our operations, providing client service, and complying with legal and regulatory requirements. We do not sell, exchange or share client information with outside organizations unless the third party is essential in administering our operations. For example, we work with various unaffiliated custodians to administer client accounts held by those custodians.

We make every effort to maintain the most up to date, complete and accurate client and account information. If you believe any information is inaccurate please call us at 888-404-1557. We will investigate the problem, and if it is determined that the information is incorrect, we will take appropriate action quickly and according to industry practices and applicable law.

Client information is accessible only by authorized employees. Our employees are responsible to protect the confidentiality of client information and are subject to appropriate disciplinary measures to enforce that responsibility.

We maintain appropriate safeguards regarding client information. This includes use of security procedures to prevent revealing client information to inappropriate or unauthorized sources.

Other than as we explained above, we do not reveal specific information about clients or their accounts to unaffiliated third parties, with the following exceptions:

1. If the client requests it.
2. If the information is required by law (for example, a subpoena or court order to produce records regarding the client's account). In such instances, information provided is limited to that required by the specific law.
3. If the information is required by an auditor or examiner for the purpose of completing an audit or regulatory examination.
4. To make available products or services that are offered by a third party who is under contract to provide these services. These companies or vendors must agree to respect the privacy of any client information provided.

These policies also apply, to the extent applicable, to persons who visit our website and provide us with any personal information other than their name, address and general area of investment interest.