



WHAT DOES IPSWICH INVESTMENT MANAGEMENT, CO., INC. ("IIM") DO WITH YOUR PERSONAL INFORMATION?

Why?	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.
What?	The types of personal information we collect and share depend on the product or service you have with us. This information can include: <ul style="list-style-type: none"> ▪ Social Security number, driver's license number, and income ▪ account balances and transaction and payment history ▪ investment experience and assets
How?	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons IIM chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does IIM 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	No
For our marketing purposes— to offer our products and services to you	Yes	No
For joint marketing with other financial companies	No	We don't share
For our affiliates' everyday business purposes— information about your transactions and experiences	N/A	N/A
For our affiliates' everyday business purposes— information about your creditworthiness	N/A	N/A
For our affiliates to market to you	N/A	N/A
For nonaffiliates to market to you	No	We don't share

To limit our sharing	<p>Call 978-356-6333 and speak with a IIM customer service representative.</p> <p>Please note:</p> <p>If you are a new customer, we can begin sharing your information 30 days from the date we sent or otherwise provided you with this notice. When you are no longer our customer, we continue to share your information as described in this notice.</p> <p>However, you can contact us at any time to limit our sharing.</p>
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Questions?	Call 978-356-6333
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Who we are	
Who is providing this notice?	Ipswich Investment Management, Co., Inc. ("IIM")
What we do	
How does IIM protect my personal information?	<p>To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings, as well as:</p> <ul style="list-style-type: none"> ▪ information access controls ▪ service provider oversight and confidentiality agreements ▪ encryption and/or internal network security of electronic customer information ▪ proper disposal of customer information ▪ periodic security training
How does IIM collect my personal information?	<p>We collect your personal information, for example, when you:</p> <ul style="list-style-type: none"> ▪ tell us about your investment or retirement portfolio ▪ give us your income information ▪ enter into an investment advisory contract ▪ seek advice about your investments ▪ direct us to buy securities or sell your securities <p>We also collect your personal information from others such as credit bureaus or other companies.</p>
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only:</p> <ul style="list-style-type: none"> ▪ sharing for affiliates' everyday business purposes—information about your creditworthiness ▪ affiliates from using your information to market to you ▪ sharing for non-affiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.</p>
What happens when I limit sharing for an account I hold jointly with someone else?	Your choices will apply to everyone on your account.
Definitions	
Affiliates	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> ▪ We do not have any affiliates.
Non-affiliates	<p>Companies not related by common ownership or control. They can be financial and non-financial companies.</p> <ul style="list-style-type: none"> ▪ IIM does not share with non-affiliates so they can market to you.
Joint marketing	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> ▪ IIM does not jointly market.
Other important information	
<p>IIM is a registered investment adviser firm with the Securities and Exchange Commission and is subject to regulatory oversight by the Securities and Exchange Commission. Any consumer wishing to file a complaint against IIM should contact the Securities and Exchange Commission through one of the means indicated below: In Person or U.S. Mail: U.S. Securities and Exchange Commission, Office of Investor Education and Advocacy, 100 F Street, N.E., Washington, DC 20549; Telephone: 800/732-0330; Fax: 202/772-9295; E- mail: help@sec.gov; Website: www.investor.gov.</p> <p>Do Not Call Policy. We maintain an internal Do Not Call preference list. We will honor Do Not Call requests within 30 days and will be effective for at least five years from the date of request. We will not make any telemarketing calls to residential or cellular phone numbers that appear on our Do Not Call list.</p>	