



# Privacy Notice

## Collection, Use and Retention of Your Information

At Knights of Columbus Asset Advisors (“KoCAA”) one of our most important responsibilities to you is the safekeeping of your personal information. We limit the collection, use, retention, and transmission of your personal information to what we believe is necessary to service your account, process transactions you have authorized us to make on your behalf, and for that which is pursuant to legal and regulatory requirements. We do not sell client information to anyone.

This Privacy Notice (“Notice”) is to inform US-based based clients of KoCAA on the collection, use, disclosure, transfer, and other processing of clients’ individually identifiable information, which includes but is not limited to [assets, transaction history, social security number], (“Personal Data”).

This notice applies to current, former and prospective clients for whom we have collected personal information. This notice does not apply to business or commercial customers.

## Types of Personal Data and Information Sources

We collect and process certain Personal Data about you. We collect and process your Personal Data for purposes that are required by applicable law, regulations, agreements or other contracts, to allow KoCAA to fulfill its business needs and legal obligations in furtherance of business relationships with our clients.

## We may collect information about you from the following sources:

- Discussions with you.
- Applications or forms you complete or information you supply to us – such as your custodian account agreement and other similar documents.
- Your transactions – such as account balances held with custodians, and your account usage.
- Third party representatives – such as your attorney, trust administrators, and accountants.

Continuation of your relationship with KoCAA indicates your consent with our using your Personal Data to send you communications related to your account, including without limitation marketing communications.

## **Protection of Your Information**

We maintain electronic, physical and procedural safeguards. Electronic safeguards include but are not limited to: use of firewalls, encryption of e-mails containing Personal Data and password protection of workstations. Physical safeguards include but are not limited to: shredding of documents that include Personal Data and securing physical records at the office in which we work.

## **Sharing Information with Third Parties**

Under Regulation S-P firms like ours are required to have policies and procedures addressing the protection of customer information and records. We do not disclose non-public Personal Data about our clients or former clients to anyone, except as permitted by applicable law or regulation, including Regulation S-P. We may disclose Personal Data that we collect to certain nonaffiliated third parties, such as service and data providers and other such parties whose products and services are necessary for our regulatory compliance and essential to day-to-day functions. Service providers and affiliates are obligated to keep Personal Data we share with them confidential and limit the use of such information strictly to the services they are contracted to provide to KoCAA.

Examples of third parties with whom we share your Personal Data include:

- Software service providers, such as accounting systems, that are utilized to service your account
- Custodians, executing brokers and fund administrators
- Auditors, such as financial and performance verification auditors
- Consultants, such as those in Compliance and IT
- Systems and data providers, such as Bloomberg
- Regulators
- In the case of responding to a subpoena, court order or judicial process

## **How You Can Help**

You can have a role in helping us by safeguarding your Personal Data from others and by reviewing your statements promptly and notifying us if you observe suspicious activity.

## **How to Contact Us**

If you have any questions about this Notice, or if you suspect that someone has gained unauthorized access to your Personal Data either externally or internally through KoCAA or believe that your account information is inaccurate in any way, please notify [KoCAACompliance@kofc.org](mailto:KoCAACompliance@kofc.org) or call 617-348-3174.