

Loring, Wolcott & Coolidge Trust, LLC
Loring, Wolcott & Coolidge Office, Inc.
Loring, Wolcott & Coolidge Fiduciary Advisors, LLP (Collectively “LWC”)
Supplemental Privacy Notice

You are being provided this supplemental privacy notice because you are protected by European Union privacy regulations. The purpose is to outline the basis on which we will process any personal data we collect from you or that you provide to us. Any questions, comments or requests related to any provision in this notice may be sent to us at compliance@lwcotrust.com.

We will use personal data about you only for the purposes and in the manner set forth below, which describes the steps we take to ensure the processing of personal data is in compliance with U.S. laws and regulations, as well as with European data protection legislation, including the Data Protection Acts 1988 and 2003 (as amended) and any subsequent data protection and privacy legislation, European Union Law including Regulation (EU) 2016/679, known as the General Data Protection Regulation or GDPR and any subsequent amendments (collectively referred to as “Data Protection Legislation”).

We collect personal data from you in the normal course of our business, and to comply with our legal and regulatory obligations. The personal data collected, basis and purposes of processing are detailed below. As detailed below, these activities are sometimes carried out by third parties.

Personal data	Basis of processing	Purpose of processing
Personal data (name, date of birth, address, photo identification, Social Security Number, Tax ID Number).	Necessary to enter into a relationship with you and to perform our services.	Required to enable us to serve clients and comply with applicable laws.
Financial information (including information about transactions in your LWC accounts, other financial institution account details, and income information).	Necessary to perform our services for you, or to comply with legal obligations.	Required to enable us to manage your accounts, process transactions and comply with legal obligations.
Personal information we may receive from non-affiliated third parties.	Necessary to perform our services for you, or to comply with legal obligations.	This is required to enable us to comply with legal obligations and to perform certain services.

In some circumstances, we may request your explicit consent to process personal data. In these circumstances, you are able to withdraw your consent at any time by following the instructions provided when you gave consent or at the contact details herein.

Your personal information may be transferred, stored and processed in the United States, which is a country outside the European Economic Area (“EEA”). For transfers of personal data about you outside of the EEA, we take additional steps in line with European Data Protection Legislation. We have put in place adequate safeguards with respect to the protection of your privacy, fundamental rights and freedoms, and the exercise of your rights, e.g. we establish an adequate level of data protection through EU Standard Contractual Clauses based on the EU commission’s model clauses.

We will keep personal data about you for as long as is necessary to fulfil the purposes for which it was collected as described above and in accordance with our legal and regulatory obligations. This may mean that some information is held for longer than other information. The criteria we use to determine data retention periods for personal data include the following:

- Retention in case of queries; for a reasonable period after our relationship has ceased;
- Retention in case of claims; for the period in which claims it may be enforced; and
- Retention in accordance with legal and regulatory requirements;

Further information may be found in our Data Retention and Destruction Policy.

You may have various rights under data protection legislation in your country, which may include:

Your right	What does it mean?	How do I execute this right?	Conditions to exercise?
Right of access	Subject to certain conditions, you are entitled to access your personal data which we hold.	Requests for such information should be made in writing. Please specify the type of information you would like to see.	We must be able to verify your identity. Your request may not infringe the rights and freedoms of others. Data solely retained for backup purposes is principally excluded.
Right of data portability	Subject to certain conditions, you are entitled to receive the data which you have provided to us and which is processed by us by automated means, in a commonly-used machine readable format.	Requests should be made in writing. Please specify the type of information you would like to see so that our disclosure meets your expectations.	This right only applies if processing is based on your consent or on our contract with you and when processing is carried out by automated means. It affects only personal data that was provided by you and not data created by LWC or from other sources.
Rights in relation to inaccurate or incomplete data	You may challenge the accuracy of personal data about you. You are entitled to have the inaccurate data removed, corrected or completed.	We encourage you to notify us of changes regarding personal data about you as soon as they occur.	This right only applies to personal data about you. When exercising this right, please be as specific as possible.
Right to object to or restrict our data processing	Subject to certain conditions, you have the right to object to or ask to restrict processing of personal data about you.	Requests should be sent to us in writing.	This right applies only if the processing is explicitly based on our legitimate interests. Objections must be based on your particular situation.
Right to have data erased	You are entitled, on certain grounds, to have personal data erased.	Requests should be sent to us in writing.	There are various lawful reasons why we may not be able to erase personal data.
Right to withdraw	You may withdraw consent to processing for which you have previously given consent.	Requests should be sent to us in writing.	If you withdraw your consent, this will only take effect for the future.

You may have the right under your local data protection legislation to lodge a complaint with the relevant data protection supervisory authority in your country if you consider that we have infringed applicable data protection legislation when processing personal data about you. This means the country where you are habitually resident, where you work or where the alleged infringement took place.

We reserve the right to change this Privacy Notice at any time in our sole discretion. If we make changes, we will provide notice via mail or email and post the revised policy to our website so that you can see what information we gather, how we might use that information and in what circumstances we may disclose it. By continuing to use our services after notice is provided, you accept and agree to this Privacy Notice as modified.

For further information or if you have any questions or queries about this Privacy Notice, please contact the Compliance Department by mail at Loring, Wolcott & Coolidge Trust, LLC 230 Congress Street, Boston, MA 02110, by phone at (617) 523-6531 or by email at compliance@lwcotrust.com.