



## **RHUMBLINE ADVISERS LIMITED PARTNERSHIP**

### **Privacy Notice Statement**

RhumbLine Advisers Limited Partnership (hereafter known as “RhumbLine”) respects the privacy and confidentiality of all client information. While Regulation S-P regarding consumer privacy as enacted by the U.S. Securities and Exchange Commission (SEC) applies only to clients that are *individuals*, maintaining your trust and confidence is one of our highest priorities and therefore, we have implemented an information security program designed to protect the confidential nonpublic information of our institutional clients. This privacy notice provides a brief description of our privacy practices.

RhumbLine has adopted the following policies and procedures that we believe are reasonably designed to protect the confidential nonpublic information of our institutional clients:

- RhumbLine does not disclose your nonpublic information to third parties except as permitted by you, as is necessary to service your account or as required by law.
- RhumbLine will use the same degree of care with respect to confidential client information as it does with its own most confidential information but in no event will RhumbLine use less than a reasonable standard of care.
- Confidential information is shared internally on a “need to know” basis.
- Computer access is controlled by way of passwords, firewalls and other technology applications designed to prevent unauthorized access of data.
- Records that are no longer required to be maintained will be reviewed and if disposed of will be done according to our document destruction policy.
- Vendors hired to provide services for your accounts undergo a thorough due diligence review and risk assessment based on the type of services.
- Access to RhumbLine’s office suite is restricted by way of a locked entry system.

This privacy notice will be sent annually to the email address you provided us and is also made available on our website at <https://www.rhumblinedadvisers.com>.