



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 a written 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 the Firm use less than a reasonable standard of care.
- Confidential information is shared internally to those with a “need to know.”
- Computer access is controlled by way of passwords, firewalls and other technology applications designed to prevent unauthorized access of data. Our computer network is routinely protected by the latest virus protection.
- Records that are no longer required to be maintained will be reviewed according to our document destruction policy.
- Third parties hired to provide service to your accounts undergo a thorough due diligence review and risk assessment to ensure they have adequate disaster recovery plans and information security procedures.
- Access to RhumbLine’s office suite is restricted by way of a key lock 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>.