



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 the SEC’s (Securities Exchange Commission) privacy rule, Regulation S-P, applies only to clients that are *individuals*, we believe that maintaining your trust and confidence is one of our highest priorities and therefore, have implemented a written information security program designed to protect the confidential non-public 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 non-public 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 restricted 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 protected by the latest virus protection.
- Records that are no longer required to be maintained will be destroyed according to our document destruction policy.
- Third parties we hire 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, among other things.
- Access to RhumbLine’s office suite is restricted by way of a key lock entry system.

We will continue to provide this privacy notice to the email address you provided us on an annual basis and it is also available on our website at <https://www.rhumblinedadvisers.com>.