

Client Privacy Notice

At Westfield Capital Management Company, L.P. (“Westfield”), protecting the privacy and confidentiality of your personal information is important to us. We value your business and the trust you put in Westfield. To offer you the financial services you seek, we collect, maintain and use information about you on a routine basis. To help you better understand how your personal information is protected here at Westfield we are providing you with the following statement describing our practices and policies with respect to the privacy of customer information. In the event you terminate your client relationship with us, or become an inactive client, we will continue to adhere to the policies and practices described in this notice.

Information We Collect

As a trusted investment advisor, we collect, retain and use nonpublic personal information about individual clients to provide products and services to them. We may collect nonpublic personal information about you from such sources as applications or other forms. This nonpublic personal information may include your address and social security number. We may also collect nonpublic personal information from your transactions with us or with others which may include account balances, account numbers and transaction history.

Who Receives Information and Why

All of the information Westfield collects is used for the purpose of delivering the services you have requested easily and efficiently. Westfield shares limited information it has about you with select companies, to the extent necessary, to help us provide our services. For example, when appropriate, Westfield may provide wire transfer instructions or settlement instructions to third party custodians to effect transactions between or from your accounts. Westfield does not disclose any nonpublic personal information about our clients or former clients to anyone, except as described herein and as otherwise required or permitted by law.

Service Providers

At times, Westfield will enter into arrangements with companies or firms whose expertise is essential for Westfield’s own services to function properly or to complete transactions. For example, Westfield works with specialized firms that provide proxy ballot voting services and firms which generate account statements for our clients. As permitted by law, certain service providers have access to customer information that is necessary to perform these functions. Westfield’s service providers are required, under a legal agreement, to safeguard your information and use it only for authorized purposes.

Westfield’s Website

Westfield’s website uses cookies solely to remember your use of the website. Westfield will not sell, transfer or disclose such information.

How We Protect Your Information

We understand that the protection of your nonpublic personal information is of the utmost importance. Guarding your privacy is a responsibility we take seriously. Westfield maintains strict procedures and policies to safeguard your privacy. We restrict employee access to client information to only those who have a business reason to know such information, and we educate our employees about the importance of confidentiality and client privacy.

Where to Find Out More

If you have any questions about our privacy program or the way your information is maintained and used, we would like to hear from you. Please call us at 617-428-7100, or write to:

Kathryn Kearney, Partner, CFO and CCO
Westfield Capital Management Company, L.P.
One Financial Center
Boston, MA 02111-2621

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Supplemental Data Privacy Notice for California Residents

This Supplemental Privacy Notice for California residents applies solely to individuals who reside in the State of California. This supplemental notice is provided to you in order for us to comply with the California Consumer Privacy Act (“CCPA”).

The CCPA provides some California residents with certain data rights regarding what we do with your personally identifiable information (“PII” or “PI”). If you are a California resident and it is determined that the CCPA applies to you, this section details those rights, how you may exercise them, and what Westfield will do in response.

Please note that the rights under the CCPA do not apply to PII collected, processed, or disclosed pursuant to Gramm-Leach-Bliley Act (Public Law 106-102) and Fair Credit Reporting Act (12 CFR 1022).

If you are an individual who resides in California and whose personal data is collected and processed by Westfield, you may have the right to:

- Request that we disclose, free of charge, the categories and specifics of the PI we collect about California residents (and/or, if applicable, otherwise disclose to a third-party for business purposes).
- Choose to opt-out of the sale of personal information. Westfield does not sell personal information.
- Request that we delete the PI we have collected. Following our verification of the request, we will comply with the request and delete any or all the PI in our possession that we collected from the California resident and/or any or all such PI in the possession of our service providers, unless otherwise restricted by law or regulation.

Questions and Exercising Your Data Privacy Rights

You may contact us in order to exercise any of your rights set forth in this privacy notice by calling this toll-free number (855) 469-8577 or by emailing us at wcmcompliance@wcmgmt.com. All individuals have the right to not receive discriminatory treatment by Westfield for the exercise of the privacy rights set forth in this policy.

NOTE: All data privacy requests must be accompanied by verifiable proof of identity of the requestor.

Your trust is important. Westfield is committed to protecting your privacy.