



300 FRANK W. BURR BLVD. 7TH FLOOR TEANECK, NJ 07666
201-928-1982 FAX 201-928-1401
www.sfmlp.com

Privacy Policy

Systematic Financial Management, L.P. (“Systematic” or “Firm”) recognizes its obligation to keep information about our clients secure and confidential. It’s important for you to know that we do not sell or share Client Information with marketers outside Systematic Financial Management L.P. (“Systematic”). Systematic carefully manages information among our service providers to provide our clients with better service, more convenience, and to offer benefits to our clients.

This Policy covers Client Information, which means personally identifiable information about a client or a client’s current or former relationship with Systematic.

It is Systematic’s policy to ensure Client Information is protected, maintained and disposed of in ways that the information is safeguarded from unauthorized uses or disclosures. Systematic will take reasonable measures to dispose of clients’ personal information in such a manner that the information cannot be read or reconstructed for unauthorized use. Systematic will determine the appropriate method of disposal on an as needed basis.

Collecting Information

In the course of conducting business with you, we collect and use various types of information to service your accounts, to save you time and money and to better understand your needs.

We collect the following Client Information about you from the following sources:

1. Information you provide to us on applications and contracts and through other means, such as names, addresses and social security or tax-identification numbers, income, occupation and birth date; and
2. Information about client transactions and account experience with Systematic, such as client account balances, investment history, and information about the Firm’s communication with our clients, such as account statements, trade confirmations and call activity.

Sharing Information with Third Parties

Systematic typically does not share non-public client information with unaffiliated third parties other than as necessary to carry out the actual performance, or assess the quality, of the investment management services it has been hired to provide. Thus, we may share Client Information with service providers that work for us to provide you with products and services that you may have requested or already have with us. We share only the information needed to provide these services and to provide high quality client experience. These service providers may include financial services providers, such as client accounts’ custodian banks, transfer agents, administrators and investment companies and non-financial companies, such as proxy voting service providers and data processing companies. These service providers might assist the Firm, for example in fulfilling service requests or contractual requirements, processing transactions, maintaining company records, or helping mail account statements and trade confirmations. Systematic may also use such information in the account opening process including conducting anti-money laundering screening. All of these companies act on the Firm’s behalf, and are obligated to keep the information that Systematic provides to them confidential, and use the information only to provide the services the Firm has asked them to perform for the Firm or the Firm’s clients. Systematic does not sell client information to unaffiliated third parties for marketing purposes.

Disclosing Information in Other Situations

We may also disclose Client Information to non-affiliate third parties when permitted or required by law. This may include disclosure in connection with a subpoena or similar legal process, or an audit or examination. We may also share Client Information outside our family of service providers, but only if we have your consent.



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Disclosure of Information to Affiliates

As an affiliate of Affiliated Managers Group (AMG), Systematic may also share information about its experiences or transactions with clients or their accounts with AMG. Except as permitted by The Gramm Leach Bliley Act, AMG abides by a "No Share" policy whereby this information is not shared with other affiliates or with non-affiliated third parties.

Security of Information is a Priority

Keeping financial information secure is one of our most important responsibilities. We value our clients trust, and we handle information about the Firm's clients with care. Our associates are governed by confidentiality policies requiring confidential treatment of Client Information.

We also limit access to non-public Client Information to those employees and service providers who need to know that information to provide products and services to you or to maintain or service those products or services.

Additionally, we maintain physical, electronic and procedural safeguards that comply with federal standards to protect your non-public, personal Client Information and ensure its integrity and confidentiality.

We continually assess new technology for protecting information and we upgrade our systems when appropriate.

Making Sure Information is Accurate

Keeping the information about client accounts accurate and up to date is very important. Systematic provides clients with access to account information through various means, such as account statements. If clients ever find that account information is incomplete, inaccurate or not current, or if there are any other questions, please call or write us at 201-928-1982. The Firm will try to update or correct any erroneous information or investigate any complaint as quickly as possible.

Keeping Up to Date With our Privacy Policy

Systematic will provide notice of our Privacy Policy to clients upon opening a new account as well as annually, so long as clients maintain an ongoing relationship with Systematic. This Policy may change from time to time.