

# Boston Trust Walden. Online Privacy Notice

# Last updated July 2024

This Online Privacy Notice (Notice) applies to this Boston Trust Walden site and any Boston Trust Walden affiliate or subsidiary site that links to this Notice, including our client portal. The term "Boston Trust Walden" or "we" or "us" or "our" in this Notice refers to affiliates or subsidiaries of Boston Trust Walden Corporation that link to this Notice. This Notice describes how we may collect, use and share information from or about you. This Online Privacy Notice does not apply to any information you may provide to us, or that we may collect offline.

By visiting our sites, including the Boston Trust Walden websites and our client portal, you are accepting the practices described in this Online Privacy Policy and consent to our use of cookies and similar technology. Boston Trust Walden provides other online interfaces for clients. If you visit or access your accounts from one of these sites, the descriptions below concerning our online privacy practices apply to these sites as well.

For visitors to this site, we will use and share any information that we collect on this site from or about you in accordance with the <u>Boston Trust Walden Consumer Privacy Notice</u>.

Any additional information we provide is provided as a resource, the terms and conditions of this Notice control, and by using the site, you agree to the terms and conditions of this Notice.

# **Collecting and Using Information**

We value your privacy and recognize the sensitivity of your personal information. Our employees share the same concerns. Our <u>Boston Trust Walden Consumer Privacy Notice</u> describes how we collect, share, use, and protect your information. If you are a customer who has opened an account with us for personal, family, or household purposes, our Privacy Notice may apply to you as well and further explains how we may use your information.

# Personal Information We Collect

Personal Information means personally identifiable information such as your name, postal or email addresses, telephone, fax or mobile numbers that you may choose to provide via forms, or by using our secure email link. We do not request or collect social security numbers on our site. It is possible to browse our sites without actively submitting any personally identifiable information.

You provide personal information when you establish an account at Boston Trust Walden and when you establish access to your account information on our client portal. You also provide personal information when you request information or materials from us or when you transact in your accounts. In addition to personal information you provide to us, we may receive information about you that you authorize other parties to provide to us. We also may obtain personal information from third-party service suppliers not affiliated with Boston Trust Walden (service suppliers) in order to verify your identity to prevent fraud, and to provide you information about your accounts. Personal information collected from any source may include, among other things, your name and address, Social Security or taxpayer identification number, date of birth, assets, income, account balances, investment activity, and accounts at other institutions. The information we collect about you may be transferred to or stored by Boston Trust Walden or our service suppliers in the United States or elsewhere, as permitted by law.



#### Other Information We Collect Online

Other Information is any information other than Personal Information that does not reveal your specific identity or does not directly relate to an individual, such as browser information, information collected through cookies, pixel tags and other technologies, demographic information, and aggregated and de-identified data.

# How We Collect and Use Other Information

We and our third-party service providers may collect and use Other Information in a variety of ways, including:

- Through your browser or device: Certain information is collected by most browsers and/or through your device, such as your Media Access Control (MAC) address, device type, screen resolution, operating system version and internet browser type and version. We use this information to ensure our sites function properly, for fraud detection and prevention, and security purposes.
- Cookies: Cookies are pieces of information stored directly on the device you are using. Cookies allow us to collect information such as browser type, time spent on the site, and pages visited. We use the information, if at all, for security purposes, to facilitate navigation, and to display information more effectively. We collect statistical information about the usage of the site in order to continually improve the design and functionality, to monitor responses to our content, to understand how account holders and visitors use the site and to assist us with resolving questions regarding the site. We do not use cookies for advertising purposes.

You can refuse to accept these cookies and most devices and browsers offer their own privacy settings for cookies. You will need to manage your cookie settings for each device and browser you use. However, if you do not accept these cookies, you may experience some inconvenience in your use of the site.

- Other technologies including pixel tags, web beacons, and clear GIFs: These may be used in
  connection with some site pages to compile statistics about usage and response rates, to
  personalize/tailor your experience while engaging with us online and offline, for fraud detection
  and prevention, for security purposes, and to assist us in resolving account holders' questions
  regarding use of client portal and our site.
- IP Address: Your IP Address is a number that is automatically assigned to the device that you are using by your Internet Service Provider (ISP). An IP Address is identified and logged automatically in our server log files whenever a user visits the site, along with the time of the visit and the page(s) that were visited. Collecting IP Addresses is standard practice on the internet and is done automatically by many websites. We may use IP Addresses for calculating site usage levels, helping diagnose server problems, and administering the site.

### Additional Information

Our site also includes links to other sites and provides access to products and services available through our site through cooperative relationships with third party providers such as Constant Contact. We may share with our provider partners any information you provide, or that is collected, in the course of visiting any pages that are made available in cooperation with our provider partners. The privacy policy of our provider partners may differ from ours. If you have any questions regarding the privacy policy of one of the providers, you should contact the provider directly for more information.



### E-mail and Electronic Communications:

Electronic communication such as email, text messaging, or other forms of electronic communication are inherently insecure. Please refrain from submitting sensitive personal information (such as account number or social security number) via e-mail or similar methods of communication.

When you send an email or other electronic communication to us, you are communicating with us electronically and consent to receive reply communications from us or our providers electronically. We retain the content of email, electronic communication, your email address, unique identifier (such as Facebook or Twitter username), and our response in order to better service your needs for audit, legal, regulatory or other business-related reasons.

### Personal Information on Children:

The site is not directed to individuals under the age of thirteen (13), and we request that these individuals do not provide Personal Information through the site. We do not knowingly collect information from children under 13 without parental consent. Visit the <a href="Federal Trade Commission">Federal Trade Commission</a> site for more information about the Children's Online Privacy Protection Act (COPPA).

If we become aware that we have inadvertently received personally identifiable information from a user under the age of 13, we will delete such information from our records. Because we do not collect any personally identifiable information from children under the age of thirteen via the site, we also do not knowingly distribute such information to third parties.

### Service Providers:

We may engage service providers who assist us in delivering our services. These providers are contractually bound to protect the confidentiality and security of your personal information and are restricted from using it for any other purpose.

# Storage of Information:

All information we gather on our sites are stored within databases to which only we and our hosting service provider have access. However, as effective as the reasonable security measures implemented by us may be, no physical or electronic security system is impenetrable. We cannot guarantee the security of our site servers or databases, nor can we guarantee the security that information you supply will not be intercepted while being transmitted to us over the Internet.

### California Privacy Rights:

California Civil Code Section 1798-83, also known as the "Shine the Light" law, permits our customers who are California residents to request and obtain from us once a year, free of charge, information (if any) we disclosed to third parties for direct marketing purposes in the preceding calendar year. If applicable, this information would include a list of the categories of personal information that was shared and the names and addresses of all third parties with which we shared information in the immediately preceding calendar year. We invite any customer who would like to make such a request to submit your request in writing to:

Sarah Kelly, General Counsel Boston Trust Walden Company One Beacon Street, 34th Floor Boston, MA 02108



### Your Rights:

Under the California Consumer Privacy Act of 2018 (CCPA), you have certain rights regarding your personal information. These rights include:

**Right to Access:** You have the right to request access to the personal information we hold about you. **Right to Deletion:** You can request the deletion of your personal information in certain circumstances.

**Right to Opt-Out:** We do not sell your personal information. Therefore, there is no need to opt-out of any sale.

To exercise your rights, please refer to the "Contact Us" section above.

### Advertising

Boston Trust Walden advertises online (e.g., pages within our website) but we do not collect any information from this site to perform "targeted" or "tailored" advertising.

# Security

To protect Personal Information from unauthorized access and use, we use security measures that comply with applicable federal and state laws. These measures may include device safeguards and secured files and buildings as well as oversight of our third-party service providers to ensure information remains confidential and secure.

# Making sure information is accurate

Keeping your account information accurate and up to date is very important. If your account information is incomplete, inaccurate or not current, please use the Contact Us option on our site, or call or write to us at the telephone numbers or appropriate address for changes listed on your account statements, records, online or other account materials.

### Protecting individual health information

To the extent that we receive, maintain, or process an individual's protected health information, Boston Trust Walden may disclose that information as authorized by and in accordance with applicable federal and/or state law.

# **Updates to this Privacy Notice**

This Online Privacy Notice is subject to change. Please review it periodically. If we make changes to the Online Privacy Notice, we will revise the "Last Updated" date at the top of this Notice. Any changes to this Notice will become effective when we post the revised Notice on the site. Your use of the site following these changes means that you accept the revised Notice.

# Questions or Comments:

If you have any questions or comments about the Boston Trust Walden Company or affiliated sites, your experience with our site and services, and our Privacy Policy, please contact us though the Contact Us page on this site.