



SaratogaRIM.com

Saratoga Research & Investment Management
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Saratoga Research & Investment Management
OUR CONTINUING PRIVACY COMMITMENT TO YOU

As you may be aware, enacted federal privacy laws require that we explain to you how we handle “nonpublic personal information.” This is information that, in the course of our relationship with you, we receive or develop about you. It includes (1) information you provide to us orally or on applications or other forms, (2) information we develop about you in the course of providing our services to you, such as the amount and type of your assets that we manage, and transactions we place on your behalf, and (3) technical information we could develop and gather through your access to our website.

As a general rule, we do not disclose this private information to others. As you might imagine, however, we rely on certain third parties for services that enable us to provide our investment services to you. These third parties may include our attorneys, auditors, prime brokers, and custodians who, in the ordinary course of providing their services to us, may require access to records containing your nonpublic personal information. In addition, we may disclose your nonpublic personal information to others with your consent, where required by law or judicial process (such as a court order), or otherwise to the extent permitted under the federal privacy laws. When we are not comfortable that a service provider is already bound by duties of confidentiality (e.g., attorneys and auditors), we will require contractual assurances that they will maintain the confidentiality of any of your information they obtain.

We also restrict access to your nonpublic personal information among our own personnel. Only those who need the information in order to help us provide investment advisory services to you have access. We maintain physical, electronic, and procedural safeguards to guard your nonpublic personal information. We will continue to guard the privacy of your information, even if you are no longer a client. When we dispose of outdated records that we are no longer required to maintain for regulatory or business purposes, they will be shredded or securely wiped from hard drives.

Should you ever wish to view this letter online (along with our proxy voting policy and our form ADV) you may go to our website at www.SaratogaRIM.com.

If you would like a printed copy of any of these additional documents, or if you have any other questions about our practices with respect to your nonpublic personal information, you may contact us by e-mail, telephone or mail at the following:

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