

## Facts

### WHAT DOES NBT CAPITAL MANAGEMENT (NBTCM) DO WITH YOUR PERSONAL INFORMATION?

#### Why?

As a Registered Investment Advisor, NBTCM must comply with rules set forth by the Securities and Exchange Commission. One such rule, Regulation S-P, requires that we provide you with a copy of our Customer Privacy Notices on an annual basis. The following information contains our policies with respect to your personal information

#### What?

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security number
- Account Balances
- Account transactions

#### How?

All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons NBTCM chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does NBTCM share?	Can you limit this sharing?
<b>For our everyday business purposes</b> —such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	YES	NO
<b>For our marketing purposes</b> —to offer our products and services to you	YES	NO
<b>For joint marketing with other financial companies</b>	YES	NO
<b>For our affiliates' everyday business purposes</b> —information about your transactions and experiences	YES	YES
<b>For our affiliates' everyday business purposes</b> —information about your creditworthiness	YES	YES
<b>For our affiliates to market to you</b>	YES	YES
<b>For nonaffiliates to market to you</b>	NO	We don't share

#### To limit our sharing

Please contact your investment advisor or call NBTCM at (607) 584-4141 to let them know you would like to limit your sharing

**Please note:**

If you are a *new* customer, we can begin sharing your information 30 days from the date we sent this notice. When you are *no longer* our customer, we continue to share your information as described in this notice.

However, you can contact us at any time to limit our sharing.

#### Questions?

Call (607) 584-4141 or go to <https://www.nbtcapm.com>

## Who we are

<b>Who is providing this notice?</b>	<b>NBT Capital Management</b>
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## What we do

<b>How does NBTCM protect my personal information?</b>	<p>To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.</p> <p>Keeping financial information secure is one of our most important responsibilities. We maintain physical, electronic and procedural safeguards to protect Customer Information.</p>
<b>How does NBTCM collect my personal information?</b>	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> <li>▪ open an account or apply for a loan</li> <li>▪ pay us by check or deposit money</li> <li>▪ use your credit or debit card</li> </ul> <p>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.</p>
<b>Why can't I limit all sharing?</b>	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> <li>▪ sharing for affiliates' everyday business purposes – information about your creditworthiness</li> <li>▪ affiliates from using your information to market to you</li> <li>▪ sharing for nonaffiliates to market to you</li> </ul> <p>State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.</p>
<b>What happens when I limit sharing for an account I hold jointly with someone else?</b>	Your choices will apply to everyone on your account.

## Definitions

<b>Affiliates</b>	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>▪ <i>Our affiliates include other financial companies such as EPIC Retirement Plan Services, NBT Bank, and NBT Insurance.</i></li> </ul>
<b>Nonaffiliates</b>	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>▪ <i>NBTCM does not share with nonaffiliates so they can market to you.</i></li> </ul>
<b>Joint marketing</b>	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> <li>▪ <i>Our joint marketing partners include other financial institutions and credit card companies.</i></li> </ul>

## Other important information

**For California residents:** We will not share information we collect about you with nonaffiliated third parties, except as permitted by law, including, for example, with your consent or to service your account.

**For Vermont residents:** We will not share information we collect about you with nonaffiliated third parties, except as permitted by law, including, for example, with your consent or to service your account. We will not share information about your creditworthiness with our affiliates, other than as permitted by Vermont law, unless you authorize us to make those disclosures.

## Important Information about Credit Reporting

We may report information about your account to credit bureaus. Late payments, missed payments or other defaults on your account may be reflected in your credit report.