

# Welch & Forbes LLC Privacy and Cookie Policy

This Privacy and Cookie Policy explains how Welch & Forbes ("we", "us", "our") collects, uses, shares, and protects personal information across the United States, the United Kingdom, and the European Union. This Policy incorporates required elements of U.S. federal privacy law, as well as the GDPR for both the UK and EU, and applicable cookie requirements.

#### 1. Information We Collect

We collect the following categories of personal information:

- Identification and contact information (name, address, phone number, email).
- Financial and account information (SSN, account balances, transactions, assets, wire instructions, checking information).
- Information submitted through our website or communications (forms, inquiries, newsletters).
- Job applicant information (credentials, resume, work history, authorizations).
- Automatically collected data: device information, IP address, browser/OS details, usage metrics, server logs.

## 2. How We Use Personal Information

We use your information to:

- Provide and manage advisory and related services.
- Verify identity and maintain security.
- Process job applications.
- Improve and operate our website and services.
- Fulfill legal and regulatory obligations (including GLBA and SEC requirements).
- Send communications where permitted, with the ability to opt out.

## 3. Legal Bases for Processing (UK/EU Only)

Under the UK GDPR and EU GDPR, we rely on:

- Contract performance.
- Legitimate interests (service improvement, security, inquiries).
- Consent (cookies and certain marketing).
- Legal obligations (recordkeeping, compliance).

#### 4. How We Share Personal Information

We do not sell personal information and do not share for marketing with non-affiliated third parties.

We may share information with:

- Service providers under confidentiality obligations.
- Affiliates as permitted (but not for marketing).
- Legal authorities when required.
- Parties to a merger or corporate transaction.
- Analytics providers using aggregated data.

## 5. Cross-Border Data Transfers (UK/EU Only)

Personal data may be transferred to the U.S. or other locations where we operate. When required, we use approved safeguards such as Standard Contractual Clauses.

#### 6. Data Retention

We retain data only as long as needed:

- For services and regulatory obligations.
- For administrative and archival needs (not more than five years after termination unless required).
- Longer where legal obligations apply.

## 7. Your Rights

#### U.S. Rights:

- GLBA rights regarding data sharing limitations.
- California residents may have access and deletion rights.

## **UK/EU Rights:**

- Access, correction, deletion, restriction, portability, and objection.
- Withdrawal of consent.
- Right to lodge complaints with supervisory authorities.

#### 8. Cookies and Tracking Technologies

We use cookies to:

- Enable site functionality.
- Store preferences and improve performance.
- Analyze website use.

#### **U.S. Cookie Rules:**

• Notice is provided; opt-out is available depending on browser settings.

Most browsers allow disabling cookies, although some site features may not function properly when cookies are refused.

#### **UK/EU Cookie Rules:**

- Non-essential cookies require prior consent.
- You may withdraw consent at any time.
- Essential cookies remain active to support site operation.

## 9. Security Measures

We employ administrative, physical, and technical safeguards including secure systems, restricted access, and monitoring. While we take reasonable steps to protect information, no system is fully secure.

## 10. Children's Privacy

We do not knowingly collect personal information from children under 18. Information discovered to be collected in error will be promptly deleted.

#### 11. Contact Us

For questions or requests regarding this Policy or your personal information:

Welch & Forbes LLC

45 School Street, Boston, MA 02108

Email: info@welchforbes.com

Phone: 617-523-1635

This Policy applies to Welch & Forbes LLC.