

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 Notice 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?
For our everyday business purposes —such as to process your transactions, maintain your account(s), respond to court orders and legal investigations	YES	NO
For our marketing purposes —to offer our products and services to you	YES	NO
For external custodians — broker-dealers having a regulatory requirement to supervise certain NBTCM activities	YES	NO
For our affiliates' everyday business purposes —information about your transactions and experiences	YES	YES
For our affiliates' everyday business purposes —information about your creditworthiness	YES	YES
For our affiliates to market to you	YES	YES
For nonaffiliates to market to you	NO	We don't share

To limit our sharing

Please contact your 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

Who is providing this notice?

NBT Capital Management

What we do

How does NBTTCM protect my personal information?

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.

Keeping financial information secure is one of our most important responsibilities. We maintain physical, electronic and procedural safeguards to protect customer information.

How does NBTTCM collect my personal information?

We collect your personal information, for example, when you

- open an account
- conduct transactions with us
- tell us about your investment portfolio

We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.

Why can't I limit all sharing?

Federal law gives you the right to limit only

- sharing for affiliates' everyday business purposes – information about your creditworthiness
- affiliates from using your information to market to you
- sharing for nonaffiliates to market to you

State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.

What happens when I limit sharing for an account I hold jointly with someone else?

Your choices will apply to everyone on your account

Definitions

Affiliates

Companies related by common ownership or control. They can be financial and nonfinancial companies.

- *Our affiliates include companies with a common corporate identity of NBT Bancorp Inc.; financial companies such as NBT Bank, EPIC Retirement Plan Services, Third Party Administrators, Inc., Actuarial Designs & Solutions, Inc.; Downeast Pension Services, Inc.; ABG Retirement Plan Investment Services (ABGRPIS); Cleveland Hauswirth Investment Management; Retirement Direct and nonfinancial companies, such as NBT Insurance Agency.*

Nonaffiliates

Companies not related by common ownership or control. They can be financial and nonfinancial companies.

- *NBTTCM does not share with nonaffiliates so they can market to you.*

Joint marketing

A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

- *Our joint marketing partners include other financial institutions and credit card companies.*

Other important information

State Law: We follow state law if state law provides you with additional privacy protections. For example, we automatically treat customers with a Vermont mailing address as having limited our sharing with affiliates and nonaffiliates, unless you give us authorization for such sharing.