

Atlanta Capital Management Company, LLC

CLIENT PRIVACY STATEMENT

GUIDING PRINCIPLES

The relationship between Atlanta Capital Management Company, LLC (“Atlanta Capital”) and our clients is the most important asset of our firm. We strive to maintain trust and confidence in our firm, an essential aspect of which is our commitment to protecting our client’s personal information to the best of our ability. We believe that all of our clients value their privacy, so we will not disclose any personal information to anyone unless it is required by law, at the client’s direction, or is necessary to provide our services. We have not and will not sell personal client information to anyone.

THE PERSONAL INFORMATION THAT WE COLLECT, MAINTAIN, AND COMMUNICATE

Atlanta Capital collects and maintains personal information so we can provide investment management services to our clients. The types and categories of information we may collect and maintain about our clients includes:

- Information we receive to open an account or provide investment advice to our clients (such as home address, telephone number, and financial information);
- Information that we generate to service client accounts (such as trade tickets and account statements); and
- Information that we may receive from third parties with respect to client accounts (such as trade confirmations from brokerage firms).

In order for us to provide investment management services, we do disclose client personal information in very limited instances, which include:

- Disclosures to companies that perform necessary services on our behalf (such as data processing companies or consultants who assist us in maintaining our computer systems); and
- Disclosures to companies as permitted by law, including those necessary to service your account (such as providing account information to brokers and custodians); and
- Disclosures to government entities – in response to subpoenas or to comply with laws or regulations.

HOW WE PROTECT YOUR PERSONAL INFORMATION

To fulfill our privacy commitment at Atlanta Capital, we have instituted firm-wide practices to safeguard the information that we maintain about you. These include:

- Adopting policies and procedures that put in place physical, electronic, and other safeguards to keep your personal information safe.
- Limiting access to personal information to those employees who need it to perform their job duties.
- Requiring third parties that perform services for us to agree to keep your information strictly confidential.
- Protecting information of our former clients to the same extent as our current clients.