

Item 21 - Information Security Program

Privacy Notice

Privacy Notification	BOSTON PARTNERS GLOBAL INVESTORS, INC. DBA BOSTON PARTNERS (“BOSTON PARTNERS”) BOSTON PARTNERS SECURITIES, LLC (“BOSTON PARTNERS SECURITIES”)	
FACTS	WHAT DO BOSTON PARTNERS AND BOSTON PARTNERS SECURITIES DO WITH YOUR PERSONAL INFORMATION?	
Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.	
What?	The types of personal information we collect and share depend on the product or service we provide to you. This information can include: <ul style="list-style-type: none"> ■ Social Security number and assets; ■ Account balances and transaction history; and ■ Investment experience and wire transfer instructions. 	
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 Boston Partners and Boston Partners Securities choose to share; and whether you can limit this sharing.	
Reasons we can share your personal information	Do Boston Partners & Boston Partners Securities 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, or report to credit bureaus	Yes	No
For our marketing purposes – to offer our products and services to you	Yes	No
For joint marketing with other financial companies	No	No
For our affiliates' everyday business purposes – information about your transactions and experiences	Yes	No
For our affiliates' everyday business purposes – information about your creditworthiness	No	We don't share
For our affiliates to market to you	Yes	Yes
For nonaffiliates to market to you	No	We don't share

To limit our sharing:	<ul style="list-style-type: none"> ■ Call 866-773-7145 <p>Please note:</p> <p>If you are a <i>new</i> customer, we can begin sharing your information 30 days from the date we sent this notice. When you are <i>no longer</i> our customer, we may continue to share your information as described in this notice.</p> <p>However, you can contact us at any time to limit our sharing.</p>
Questions?	Call 866-773-7145

Who we are	
Who is providing this notice?	Boston Partners and its subsidiary, Boston Partners Securities, .
What we do	
How do Boston Partners and Boston Partners Securities 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.
How do Boston Partners and Boston Partners Securities collect my personal information?	<p>We collect your personal information, for example, when you:</p> <ul style="list-style-type: none"> ■ Give us your contact information; ■ Open an account or buy securities from us; and ■ Tell us where to send the money or make a wire transfer. <p>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.</p>
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only:</p> <ul style="list-style-type: none"> ■ sharing for affiliates' everyday business purposes – information about your creditworthiness; ■ affiliates from using your information to market to you; and ■ sharing for nonaffiliates to market to you. <p>State laws and individual companies may give you additional rights to limit sharing.</p>
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	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> ■ <i>Our affiliates include companies under common control by our parent company.</i>
Nonaffiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies.

	<ul style="list-style-type: none"> ■ <i>Boston Partners and Boston Partners Securities do not share with nonaffiliates so they can market to you.</i>
<p>Joint marketing</p>	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> ■ <i>Boston Partners and Boston Partners Securities do not engage in joint marketing.</i>

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