

## **Spectrum Asset Management, Inc. – Annual Disclosures**

### **CLIENT PRIVACY POLICY SUMMARY**

We consider our relationship with our clients our most important asset. We strive to maintain client trust and confidence in our firm, an essential aspect of which is our commitment to protect client information to the best of our ability. We believe that all our clients value their privacy, so we will not disclose client information to anyone unless it is required by law, at their direction, or is necessary to provide the client with our services. We have not and will not sell client information to anyone.

### **WHAT INFORMATION DO WE COLLECT, MAINTAIN AND COMMUNICATE?**

Spectrum Asset Management, Inc. (Spectrum) collects and maintains client information so we can provide investment management services to the client. The types and categories of information we collect and maintain about the client include:

- Information we receive from the client to open an account or provide investment advice to the client (such as Social Security number, account transactions, risk tolerance, wire transfer instructions, transaction history, account balances, corporate address, telephone number, financial information and tax identification number);
- Information that we generate to service the account (such as trade tickets and account statements); or
- Information that we may receive from third parties with respect to the account (such as trade confirmations from brokerage firms.)

In order for us to provide investment management services to our clients, we may disclose client information in other limited circumstances, which include:

- Disclosures to non-financial service companies that perform services on our behalf (such as our technology consultants who assist us in maintaining our computer systems); and
- Disclosures to financial service companies as permitted by law, including those necessary to service the account (such as providing account information to brokers, clearing agents and custodians (bank of client choice).

Arrangements with companies not affiliated with Spectrum will be subject to confidentiality agreements. Otherwise, Spectrum will not disclose any client information about the account(s) unless one of the following conditions is met:

- We receive prior written consent from the client;
- We believe the recipient is the client's authorized representative; or
- We are permitted by law to disclose information to the recipient.

Even if the client decides to close the account(s) or become an inactive client, we will adhere to the privacy policies and practices described above.

If you have any questions after reading this Privacy Policy Summary, please contact the Spectrum Compliance Department at [compliance@samipfd.com](mailto:compliance@samipfd.com) or by writing to Spectrum Asset Management, Inc., 2 High Ridge Park Stamford, CT 06905, or by calling (203) 322-0189 / Fax (203) 968-6082. In addition, this Privacy Policy Summary is available at [www.samipfd.com](http://www.samipfd.com).

### **Business Continuity Plan Disclosure**

Spectrum maintains a Business Continuity Plan ("BCP") which is available to clients upon request. Spectrum will review the BCP annually for completeness and accuracy and will make changes to the BCP as the firm deems necessary. Spectrum will notify clients if the BCP changes materially.

**Client Complaint Instructions and Compliance Contact Information:** Inquiries or complaints regarding your account should be directed to Spectrum Asset Management, Inc.'s Chief Compliance Officer at:

Joseph A. Hanczor, Managing Director & Chief Compliance Officer  
2 High Ridge Park  
Stamford, CT 06905 (203) 321-1134