

# Privacy Notice & Disclosures

## Privacy Notice

The Trust Company of Virginia (hereinafter known as "The Trust Company") is aware that our customers count on us to place the uppermost importance on the privacy of personal information and financial dealings with our companies. This information is necessary for us to provide the financial products and exceptional customer service to you. We are providing you with the following information regarding our privacy policy and our commitment to safeguard your personal information.

**Confidentiality and Security.** We recognize the need for privacy when dealing with personal financial information. We maintain physical, electronic and procedural safeguards that comply with federal standards to store and secure information about you from unauthorized access, alteration and destruction.

**Information We Collect.** We collect nonpublic personal information about you from the following sources:

- Information we receive from you on applications or other forms.
- Information about your transactions with our affiliates, others, or us.

**Information We May Share.** We may disclose to our affiliates all of the information that we collect, as described above. In order to effect, administer, or enforce a transaction requested or authorized by you, the customer, we may share customer information with third party service providers only in accordance with strict confidentiality. We will share information in accordance with applicable law. We do not disclose any nonpublic personal information about you to unaffiliated third parties for them to rent, sell, trade, or for their independent use.

**Employee Access to Information.** All employees must adhere to The Trust Company's policy on confidentiality. Employee access to customer information is authorized for business purposes only, and the degree of access is based on the sensitivity of the information and on an employee's need to know in order to service the customer's account or comply with legal requirements.

**Inactive Customers and Closed Accounts.** Should you ever decide to close your account(s) or become an inactive customer at The Trust Company, we will continue to adhere to the privacy policies and practices as described in this notice.

**Internet Privacy.** Like most Web sites, The Trust Company's Web may gather and maintain statistics about the number of visitors. However, visitors to our Web site are anonymous except where registration is required and cookies are used to improve your online experience. The Trust Company does not rent, sell, trade, or otherwise disclose any personal information collected through our Web site. Any information you provide is for The Trust Company's use only.

**E-Mail.** Please do not provide any account or personal information such as Social Security numbers, account numbers, or account balances within your e-mail correspondence to us. We cannot use e-mail to execute transaction instructions (without written confirmation from us), provide personal account information, or change account registration.

Your confidence in us is important and we want you to know that your personal and account information is safe. If you have any questions or concerns, please contact us.

## **Important Information About Procedures For Opening A New Account With The Trust Company**

To help the government fight the funding of terrorism and money laundering activities, Federal law requires all financial institutions to obtain, verify and record information that identifies each person who opens an account.

What this means for you: When you open an account, we will ask you for your name, address, date of birth (in the case of an individual), taxpayer identification number, and other information that will allow us to identify you. We may also ask to see your driver's license or other identifying document in order to verify the information that you have provided to us. We are required by law to attempt to match the information provided by you against lists issued by various governmental agencies to confirm that you are not a known or suspected terrorist or in any way affiliated with a known or suspected terrorist group.

If you have any questions about this process, please discuss them with your account officer or our internal anti-money laundering program coordinator. Thank you for your cooperation and understanding with this process.

**Disclosure Statement for The Trust Company**

**Funds awaiting investment or distribution:** All cash or cash equivalents received into an account are generally invested or swept into a money market fund or other interest bearing investment during the normal course of business. Distributions from an account are removed from the account and from investment and other interest bearing accounts on the business day that distributions are processed. Depending upon the timing of the collection of account funds received and distributed and the availability of those funds, interest or other income may be earned on funds held for investment, sweep or distribution. All such interest income shall be paid to The Trust Company.

**Class Action Litigation:** The Trust Company will participate in class action litigation only when deemed beneficial to the account by The Trust Company. Should the account holder desire to participate in class action litigation not deemed beneficial by The Trust Company, the account holder accepts full responsibility for gathering information required to participate and holds The Trust Company harmless for any performance of the litigation.

**Objection To Disclosure of Beneficial Ownership**

In an effort to permit direct communications between a company which issues securities and the shareholder who votes the securities, the Securities and Exchange Commission (SEC) has adopted a rule, referenced as 14b-1c, "Shareholders Communication Act".

For your protection, the Rule prohibits the requesting company from using your name and address for any purpose other than corporate communications.

The Trust Company is authorized to refuse to disclose the Owner's name, address, and security position(s) of current and/or future holdings that the Owner(s) may own from time to time pursuant to SEC Rule #14b-1(c).

**Soft Dollar Arrangement:** The Trust Company of Virginia has in place limited soft dollar relationships with third parties to obtain investment research. Soft dollar relationships are generally arrangements whereby credits are generated by account securities transactions to pay for investment research or other products and services benefiting discretionary accounts. If you would like additional information on soft dollar arrangements or the research that is obtained, please contact your account investment officer.

**FDIC Disclosure:** Investments are not insured by the FDIC, and are not a deposit or other obligation of, or guaranteed by, The Trust Company of Virginia, and are subject to investment risks, including possible loss of principal amount invested.

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**Certification:**

I hereby certify that I have received a copy of the following account documents as required in conjunction with the opening of my account.

- Account Agreement
- Fee Schedule
- Other:

1. The source of funds being deposited to my account is:

2. I expect the following transaction activity (wires, ACH check distributions):

_____	_____
Customer Signature	Date

_____	_____
Customer Signature	Date