

# Privacy Policy

This policy covers Client Information, which means personally identifiable information about a consumer or a consumer's current or former relationship with Commonwealth Trust Company.

Keeping financial information secure is one of our most important responsibilities. Protecting the privacy of our clients, including Grantors, their beneficiaries and trusts, and their personal account information is held in the highest priority at Commonwealth Trust Company ("Commonwealth"). We maintain physical, electronic and procedural safeguards to protect Client Information. As a result, under no circumstances will Commonwealth sell, share or otherwise provide your Client Information to any non-affiliated third party entity, except as set forth in this policy.

In order to maintain and service client accounts, Commonwealth will gather and store information about our clients and the trusts they establish with Commonwealth. This information, collected via our new account profile and other account documentation, is critical to open and administer our trust accounts. In addition to this collected information, transactions facilitated for your account through Commonwealth will be kept for reporting purposes and pursuant to our regulatory requirements. To provide superior service to our clients, it may be necessary for Commonwealth to share information with third parties that provide services to our trusts and that may be currently involved in a contractual relationship with Commonwealth or, in the case of your trust's custodian and/or investment advisor, may have a relationship with the trust under the terms of its governing instrument or under arrangements made by a Co-Trustee, Investment Advisor or other fiduciary. This sharing of Client Information is carried out on a strictly professional basis and is incidental to servicing your account.

Through the normal course of servicing your account, certain agents and employees may have access to your confidential account information. This may include operations and support personnel. Access to this information is limited and held in the strictest confidence. Employees are authorized to access Client Information only when they have a reasonable business need for the information. Our employees are required to give confidential treatment to Client Information and are subject to disciplinary action if they fail to do so.

Information about former clients who do not currently maintain an account relationship with Commonwealth is not shared with any outside party.

Due to the relationships that Commonwealth has with financial institutions that provide investment services to the trusts we administer, sharing of information with these financial institutions is critical to servicing your account. Allowing this sharing process to continue uninterrupted will allow you to take full advantage of the value offered by the relationship between your trust's investment advisor and Commonwealth.

We may also share Client Information when required or permitted by law. For example, Client Information may be disclosed in connection with a subpoena or similar legal process. We may also share any Client Information outside of Commonwealth if we have your consent, such as when we respond to your service requests.

If you would like more information about Commonwealth's Privacy Policy, please notify us in writing to Commonwealth Trust Company, 29 Bancroft Mills Rd. 2<sup>nd</sup> Floor, Wilmington, DE 19806 or via email to [ctc@comtrst.com](mailto:ctc@comtrst.com).