1911 TRUST

The 1911 Trust Company, LLC

Privacy Policy

The 1911 Trust Company recognizes that quality relationships with clients are built with quality services and products and sensitivity to our clients' needs and concerns. We believe that part of providing quality service is protecting each person's right to privacy. It is in the best interest of our clients and of The 1911 Trust Company to protect against improper disclosure of personal information. To this end we have formulated this privacy policy.

This policy describes how we protect the confidentiality of the nonpublic personal information you share with us, the types of information we collect and how we use it and, how, on a limited basis, we share it. It is The 1911 Trust Company's policy not to sell client information or client lists to third parties.

Terms We Use in This Policy

We, our, and **us** means The 1911 Trust Company.

Nonpublic personal information means personally identifiable financial information about you that we collect and that is not available from public sources, such as telephone directories or government records.

An **affiliate** is a company we own or control, a company that owns or controls us, or a company that is owned or controlled by the same company that owns or controls us. Ownership does not mean complete ownership, but means owning enough to have control.

A **third party** is a company that is not an affiliate of ours.

Information We Collect

The information we collect is limited to what we believe is necessary or useful to conduct our business; to understand your financial needs so that we can provide you with the services, financial products and opportunities you want; to protect and administer your records, accounts and funds; to comply with certain laws and regulations; to comply with your requests of us; and to help us design or improve our products and services. We collect this information from the following sources:

Information we receive from you on applications or other forms or in other communications with you, such as your name, address, social security or tax identification number, assets, income and debts, financial needs and goals. Information about your transactions and experiences with us or others, such as your account balance, payment history, and parties to transactions. Information we receive from public records and market research, such as demographic information. Information we receive from third parties relating to their relationships with you, such as a verification of employment history, loan or credit card balance, trade confirmations, insurance coverage or aggregated information from multiple financial services providers. Information we receive from consumer reporting agencies, such as information regarding your creditworthiness or credit history.

Information We Share

We do not sell client lists or client information to third parties. We do not share nonpublic personal information about existing clients with nonaffiliated third parties, except as requested by you or as otherwise permitted by law and as described below. We only share information of former clients to the same extent that we share information of existing clients.

Fiduciary Information

Certain information, such as fiduciary information, is subject to more restrictive information sharing limits by law, agreement and fiduciary duty than other types of information. We strictly adhere to those limits. If you have any question regarding fiduciary information, please contact us.

Nonpublic Personal Information and Affiliates

We may share information with affiliated companies providing financial and related services. We do not currently have any affiliates with which we share such information, but we reserve the right to share such information with future affiliates.

Sharing Information With Companies That Work With Us

In order to conduct company business, and to offer products or services that may complement your relationship with us, we may share some or all of the information we collect, as described above, with companies that perform services for us or on our behalf, such as vendors we hire to prepare account statements or to provide support for one or more of our products and services.

These companies act on our behalf, and are contractually obligated to keep the information we provide them confidential and to use the information only for the purposes authorized. We value our client relationship with you and will not disclose your nonpublic personal information to such parties except as authorized by you or otherwise permitted by law.

Sharing Information in Other Situations

We may share some or all of the information we collect, as described above, as otherwise authorized or required under applicable law. This includes, for example, disclosures to credit reporting agencies; disclosures to process and service your requested or authorized transactions; disclosures in connection with recording instruments in public records; disclosures in connection with subpoenas or other legal processes; disclosures as part of fraud investigations; disclosures in connection with audits and examinations; disclosures in connection with the sale of accounts to another financial institution; and disclosures pursuant to your authorization or consent.

Protecting Information About You

We restrict access to nonpublic personal information about you to those employees and agents who need to know that information as part of their job responsibilities. We take appropriate disciplinary measures to enforce employee privacy responsibilities. We maintain physical, electronic, and procedural safeguards that comply with applicable federal standards to safeguard your nonpublic personal information.