

Trust Company of Vermont Client Privacy Policy – 2018

You probably receive communications from other financial institutions giving you an opportunity to "opt out" of sharing financial information about you. The State of Vermont has stricter standards than the federal regulations, requiring a consumer to "opt in" before their non-public information can be shared. **In any case, we are not asking you to take any steps to secure your financial or personal information simply because TCV does not share this information.**

We do not have separate departments that might offer financial products or services.

At Trust Company of Vermont, keeping your financial information secure is one of our most important responsibilities. Thus, we:

- Limit access to client information to those employees who need to know that information to provide trust or investment management services to you or to maintain or service those products or services.
- Are bound by a Code of Ethics requiring confidential treatment of client information, and our employees are subject to disciplinary action if they fail to follow this code.
- Maintain physical, electronic and procedural safeguards to protect client information, including ongoing cybersecurity training.

Collecting Information

We collect and use various types of information only to service your account.

- You furnish us with this information during one or more of three stages: financial and estate planning, the account opening process, and the ongoing administration of your account.
- This could occur in writing, in person, by telephone, electronically or by any other means.
- Examples could include names, addresses, social security numbers, account history and/or information regarding your assets and income.

This information is vigorously guarded by us to the same degree your attorney would protect information about you during the estate planning process for all three stages. We do not collect information for purposes of offering you products or services except for services that you've requested or already have with us.

Sharing Information with Companies that Work for Us.

We may share some client information with companies that work for us, as part of our services. These companies include the firm that assists us with the data processing of your account and the internet access to your statements; the company that provides tax processing; employees of the New Hampshire Trust Company, who participate in our joint Trust Investment & Administration Committees; and, in some instances, companies that facilitate sending proxies and annual reports, or email newsletters, to those clients who have requested this information.

All of these companies act on our behalf, are contractually obligated to keep the information that we provide to them confidential, and use the information only to provide the services we've asked them to perform for you and us.

Medical & Health Information

Trust Company of Vermont does not routinely hold client medical or health information, but we may receive such information in the administration of your account if you ask us to pay medically related bills or process health insurance claims on your behalf. We do not share medical or health information about our clients except as necessary to process

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Legally Required Disclosures

We may also disclose any client information when required by law. For example, this may include:

- A disclosure in connection with a subpoena or similar legal process,
- A fraud investigation,
- Recording of deeds of trust and mortgages in public records,
- An audit or examination,
- Notifications required of trustees under laws such as the Vermont Trust Code, the New Hampshire Trust Modernization Act, and other states' trust statutes,
- Disclosures required under Securities & Exchange Commission (SEC) mutual fund regulations.

Internet Account Privacy

Safeguarding your personal information when using the Internet to view your statements is very important. When using our website, personal information is not collected, unless you choose to identify yourself via our contact form. Please see our full Digital Privacy Policy (www.tcvermont.com) for our privacy practices regarding our website and Internet access to statements.

Cybersecurity - regular Internet e-mail is not secure. Please do not send confidential information such as social security, account numbers or personal information to us via regular e-mail. In instances where e-mail addresses are provided, they are offered for informational inquiries of a non-sensitive and non-confidential nature. We provide access to a secure email option for communication of confidential information. You are responsible for the appropriate security over the related password and your personal computing devices.

Our Duty to Make Sure Information is Accurate

Keeping your account information accurate and up to date is very important. We provide you with access to your account information through various means such as account statements, and Internet access.

If you ever find that your account information is incomplete, inaccurate or not current, please call us at 877-753-4401 or write us at Box 1280, Brattleboro, VT 05302-1280. We will promptly update or correct any erroneous information.

Who is covered by this Privacy Policy?

Our Privacy Policy applies to current clients, past clients, and anyone who had contact with us as a potential client.

Annual Maintenance of Our Privacy Policy

We will provide notice of our privacy policy annually, as long as you maintain an ongoing relationship with us. You can also review our current policy on our website, www.tcvermont.com, or contact us for a copy at 877-753-4401.