

*Western Reserve Trust Company believes that it is essential to protect the privacy of client information. We adhere to the highest standards of confidentiality and discretion with respect to our clients' confidential information. This notice contains (1) a summary of the non-public information that we may collect from and maintain on behalf of our clients, (2) our policy regarding the use of that information, and (3) the measures we take to safeguard that information. We do not sell non-public information to anyone and only share it with others as described in this notice.*

## INFORMATION WE COLLECT

In the course of our business relationship, we may obtain non-public information about clients, including:

- Your name, address, date of birth and other information which will allow us to identify you. We may also ask you for a Form W-9 and/or a copy of your driver's license, passport or other identifying documents.
- Information we receive from you on applications, surveys or other forms (such as your name, address and social security number and information about your employment, income, assets, beneficiaries and investment objectives).
- Information about your transactions with us or others (such as account activity, loan history and transaction information from other banks and financial advisers with whom you work).
- Information we might receive from outside agencies or other advisers or investment managers with whom you work.

## DISCLOSURE POLICY

We do not disclose any non-public information about our clients or former clients to anyone, except as permitted by law to facilitate our services to our clients or as otherwise required by law. As allowed by law, we share information about current and former clients among our affiliates as necessary to help us service your account with us. We also provide restricted client information to non-affiliated companies that require the information to provide specific services to client accounts.

## INFORMATION SECURITY

We have implemented procedures designed to restrict access to your non-public personal information to those employees who need it to perform their job responsibilities. We maintain physical, electronic and procedural safeguards that comply with federal standards to guard your non-public information.



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