

Privacy Notice

FACTS	What does TFO-TDC, LLC (“TFO-TDC”) do with you personal information?
What?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share and protect your personal information. Please read this notice carefully to understand what we do.
What?	The types of personal information we collect and share depend on the product or service you have with us. This information can include: <ul style="list-style-type: none"> ▪ Information TFO-TDC receives from you on forms (such as name, address, Social Security number, risk tolerance, assets, employment history and income); ▪ Account balances, account transactions and transaction history ▪ Insurance related information, including medical information.
How?	All financial companies need to share customers’ personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers’ personal information; the reasons TFO-TDC chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does TFO-TDC share?	Can you limit this sharing?
For our everyday business purposes-such as to process your transactions, maintain your account(s)	Yes	No
For marketing purposes-to offer our products and services to you	Yes	No
For joint marketing with other financial companies	No	No
For our affiliates’ everyday business purposes-information about your transactions and experiences	Yes	Yes
For our affiliates’ everyday business purposes-information about your creditworthiness	No	No
For our affiliates to market to you	Yes	Yes
For nonaffiliates to market to you	No	No

To limit our sharing	<p>Call toll-free 877-891-9997. Please ask for our Privacy Officer, Chris Tracey, with a request for your privacy preferences to be limited.</p> <p>Please note: If you are a <i>new</i> customer, we can begin sharing your information 30 days from the date we sent this notice. When you are <i>no longer</i> our customer, we continue to protect and share your information as described in this notice. However, you can contact us at any time to limit our sharing.</p>
Questions?	Call toll-free 877-891-9997

Who we are	
Who is providing this notice?	TFO-TDC, LLC (“TFO-TDC”)
What we do	
How does TFO-TDC protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. TFO-TDC maintains physical, electronic and procedural safeguards to guard your nonpublic personal information. These measures include computer safeguards and secured files and buildings.
How does TFO-TDC collect my personal information?	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> ▪ Enter into an investment advisory contract ▪ Open an account with your custodian.

	<ul style="list-style-type: none"> ▪ Provide information to us, orally and in writing, for the management of your account, such as give us your income information. ▪ Make deposits or withdraws from your account at your custodian. ▪ Show your government-issue ID or drivers license.
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only:</p> <ul style="list-style-type: none"> ▪ Sharing for affiliates' everyday business purposes – information about your credit worthiness ▪ Affiliates from using your information to market to you ▪ Sharing for nonaffiliates to market to you
What happens when I limit sharing for an account I hold jointly with someone else?	You choices will apply to everyone on your account – unless you tell us otherwise.

Definitions	
Affiliates	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> ▪ TDC Companies; TDC Life; TDC Risk Management; One to One, LLC
Nonaffiliates	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies</p> <ul style="list-style-type: none"> ▪ None
Joint marketing	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> ▪ None

Other important information
<p>TFO-TDC is committed to client confidentiality and to protect your privacy.</p> <p>TFO-TDC does not sell any personal information about you to any third party.</p>