

TFO-TDC, LLC Privacy Notice

TFO-TDC, LLC (TFO-TDC) is committed to client confidentiality and the protection of your privacy. The following information is provided, as required by law, to help you understand our privacy policy and how we will handle and maintain confidential personal information as we fulfill our obligations to protect your privacy. "Personal information" refers to the nonpublic financial information obtained by TFO-TDC in connection with carrying out our services.

Information We Collect

TFO-TDC collects personal information as part of our relationship to you, to provide client services and fulfill legal and regulatory requirements. The type of information TFO-TDC collects may include:

- Information TFO-TDC receives from you on forms (such as name, address, Social Security number, profile documents, assets and income);
- Information you provide TFO-TDC directly about your personal finances or personal circumstances or which TFO-TDC may receive from brokerage statements or other information you authorize TFO-TDC to receive.

Information Disclosed In Administering Products and Services

TFO-TDC will not disclose personal information about current or former clients to non-affiliated third parties except as permitted or required by law or with consent. Because we rely on certain third parties for services that enable us to provide our advisory services to you, such as our attorneys, auditors, other consultants, brokers, and custodians who, in the ordinary course of providing their services to, may require access to information, may share non-public personal information with such third parties. TFO-TDC does not sell any personal information about you to any third party.

Information we may share may include your name, address, social security number, assets, income, investment holdings and other financial information.

Procedures to Protect Confidentiality and Security of Your Personal Information

TFO-TDC has procedures in place that limit access to personal information to those employees who need to know such information in order to perform business services. In addition, TFO-TDC maintains physical, electronic and procedural safeguards to guard your nonpublic personal information.

TFO-TDC will update its policy and procedures when necessary to ensure that your privacy is maintained and that TFO-TDC conducts business in a way that fulfills our commitment to you. If TFO-TDC makes any material changes in its privacy policy, we will make that information available to clients through our Web site and/or other communications.

Information We Disclose to Affiliated Third Parties

TFO-TDC may share client non-public personal information with TFO Phoenix, Inc. our affiliated investment adviser; BridgePoint Risk Management, LLC, an affiliated insurance agency; PandoTree Trust Company, LLC an affiliated trust company; and TDC Companies, Inc. an affiliated management company.

Former Clients

If you decide to close your account(s) or become an inactive customer, we will adhere to our privacy policies, which may be amended from time to time.

Changes to Our Privacy Policy

In the event there were to be a material change to our privacy policy regarding how we use your confidential information, we will provide written notice to you. Where applicable, you would be given an opportunity to limit or opt-out of such disclosure arrangements.

Questions

If you have questions about this privacy notice or about the privacy of your customer information call our main number (419) 891-9999 and ask to speak to the Chief Compliance Officer.