



**Smithfield**  
TRUST COMPANY

— EST. 1996 —

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**In re: 2025 Privacy Notice**

Financial institutions are required to issue an “Annual Privacy Disclosure” in order to detail the institution’s privacy policies with respect to the sharing of customers’ nonpublic personal information with affiliates or nonaffiliated third parties. The following is Smithfield Trust Company’s Policy for 2025:

- *Categories of Information Collected* – Nonpublic personal information, which may include name, address, email, telephone, Social Security number, taxpayer identification number, date of birth, occupation and proof of identification, are collected when one becomes a Smithfield Trust Company (“Smithfield”) customer or over the course of the customer relationship.
- *Categories of Information Disclosed and Categories of Parties to Whom Information is Disclosed* - Only certain third parties which assist Smithfield in the management of your accounts are provided information necessary to their specific roles. Examples of providing information to such a third party are: (1) a name and address to our print vendor for the preparation of our customer statements or other similar mailings; and (2) sharing customer identification information with our name screening vendor for comparison against the Offices of Foreign Asset Control (“OFAC”) and other government lists as directed by the appropriate banking regulators and law enforcement officials. In addition, we may send nonpublic personal information to tax preparers, independent investment managers, bankers, lawyers and the like, as necessary, all at your request or instruction.
  - We will disclose information about you if legally required to do so by court order, subpoena or federal, state or local laws. If so mandated, however, we will advise you of that action and the legal necessity for the disclosure. We will also disclose information as required by the Bank Secrecy Act for fraud prevention, but any such information will only be provided to legal authorities through a secure system.
- *Policies and Practices With Respect to Protecting the Confidentiality and Security of Nonpublic Personal Information:*
  - All information about you, your family and your financial affairs is maintained in strict confidence and maintained as such internally at Smithfield.
  - Smithfield has strict information technology policies with respect to housing customer data electronically.
  - Smithfield utilizes multiple encryption methods to share statements, tax information, and other personal information safely via electronic means, if necessary.

Please know that Smithfield never sell, share or otherwise disclose information about you to unrelated third parties for their use in selling products or services to you. This notice requires no action on your part, however if you have any questions, please do not hesitate to contact me. We appreciate your continued confidence in Smithfield Trust Company.

Sincerely,

  
Elizabeth J. Poggi  
President & CEO