

Tri-Star Trust Bank is committed to safeguarding information provided to us by our clients. We value your business and are committed to maintaining your trust. This notice is designed to provide you with a summary of the non-public personal information we may collect and maintain about our current or former clients; our policy regarding the use of that information; and the measures we take to safeguard the information. Please always be aware that Tri-Star does not sell non-public personal information to anyone and only shares it as described in this notice.

INFORMATION WE COLLECT

When beginning a relationship with Tri-Star, you provide us with your non-public personal information. We collect and use this information to accurately identify you; protect and administer your records, accounts, and funds; help us design or improve our products and services; understand your financial needs; respond to your requests; save you time when you apply for new products and services; offer you quality products and services; and comply with certain laws and regulations.

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| The non-public personal information we collect falls into the following categories: |
| Information we receive from you on applications or other forms, whether we receive the form in writing or electronically. For example, and not limited to, this information includes your name, address, tax identification number, birth date, phone numbers, email address, investments, estate planning documents, insurance, beneficiary information, and your personal investment and banking account information. |
| Information about your transactions and account history. This category includes communication to us concerning your investments. |
| Other general information that we may obtain about you such as demographic information. |

DISCLOSURE POLICY

We may share all of the information we collect as part of the ordinary course of providing financial products and services, for the purpose of offering you new products and services to address your financial needs, for product development purposes and as otherwise required or permitted by law.

To assist in our business dealings with you, we may also share this information with companies that perform services, including marketed services, on our behalf. We do not share your information with mailing list or direct marketing companies. Thus, the information you provide to us will not result in unwanted solicitations from third-party marketers.

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| We may share non-public information for the following purposes: |
| To respond to a subpoena or court order, judicial process, or regulatory inquiry. |
| To report suspicious transactions to government agencies and law enforcement officials. |
| To protect against fraud. |
| To provide products and services with the consent or the direction of a client. |

Except as described above, and except for information we provide to nonaffiliated third parties as otherwise required or permitted by law, we do not share information about you with nonaffiliated third parties. We do not sell your information.

You may ask us to not share information about you with non-affiliated companies. Even if you do ask us to not share, we may do so as required or permitted by law.

To ask us not to share your information you may contact us at:

Tri-Star Trust

Attn: Compliance Department
1004 N. Michigan Avenue
Saginaw MI 48602

Phone: 989.921.0010

Email: tom.vanhoof@tristartrust.com

Access to your personal and account information is restricted to those employees who need to know that information as part of their job, to service your account or to provide products and services to you. We maintain physical, electronic, and procedural safeguards that are reasonably designed to guard your non-public personal information.

We recognize that the accuracy of your personal information is critical, and we follow procedures to reasonably ensure the accuracy of your information. If you find that information we have on file or have reported to another party does not appear to be accurate, contact us using the mailing address, email, and phone number listed above. Please be sure to include your account number and the information will be corrected. We reserve the right to change this Privacy Policy Notice, and any of the policies described herein, at any time. The examples contained in this Privacy Policy Notice are illustrations; they are not intended to be exclusive.