



## Privacy Policy

Thompson, Siegel & Walmsley LLC ("TSW") recognizes that our relationships with current and prospective clients are based on integrity and trust. We work hard to maintain your privacy and are very careful to preserve the private nature of our relationship with you. Over our long history as a financial services provider, we have placed the highest value on the information you share with us. We believe that all of our clients value their privacy, so we will not disclose your personal information to anyone unless it is required by law, at your direction, or is necessary to provide you with our services. We adhere to the same high standards to protect nonpublic personal information regarding our former clients as well as our current clients. We have not and will not sell your personal information at any time.

**We want our clients to understand what information we collect, how we use it and how we protect it responsibly.**

### Why We Collect Your Information

We gather information about you and your accounts so that we can:

- Help design and implement the investment related services we provide you;
- Design and improve the services and products we offer; and
- Comply with the laws and regulations that govern us.

### What Information We Collect and Maintain

The information we collect may include (but may not be limited to) the following types of "nonpublic personal information" about you:

- Information from our initial meeting and subsequent consultations about your identity, such as your name, address, social security number, and financial information (income and assets);
- Information that we generate to service your account (such as trade tickets and account statements); and
- Information that we may receive from third parties with respect to your accounts (such as trade confirmations from brokerage firms and custodial account information).

### What Information We Disclose

We are permitted by law to disclose nonpublic personal information about you to affiliated or unaffiliated third parties in certain circumstances. For example, in order for us to provide investment management services to you, we may disclose your personal information in limited circumstances to various service providers, such as brokers and custodian banks.

Otherwise, TSW will not disclose any personal information about you or your account(s) unless one of the following conditions is met:

- We receive your prior written consent;
- We believe the recipient is your authorized representative; or
- We are required by law to disclose information to the recipient.

Arrangements with companies not affiliated with TSW will be subject to confidentiality agreements.



### **How We Protect Your Personal Information**

Privacy has always been important to TSW. We restrict and limit employee access to client information only to those who need it to carry out their business functions. We educate our employees about safeguarding client information and preventing its unauthorized access, disclosure or use. We also maintain physical, electronic and procedural safeguards to protect your nonpublic information.

### **Cookies**

Unless you voluntarily provide personal information on our website, your visit will be completely anonymous. Personal information is collected only when intentionally submitted by you or your representative. Only our employees and service providers who need your personal information to provide services to you have access to the data.

TSW may aggregate data about visitors to this website to improve its design and content. This includes, but is not limited to, how many people visit the site, which pages they visit, and what browser and operating system they use. We may also use cookies (a cookie is a small text file stored on your computer) for session management or to analyze site usage.

TSW reserves the right to change this Privacy and Cookie Policy at any time.

By using this website, you consent to the use of cookies — details of which can be found below.

### **Use of Cookies**

Cookies are small text files that are placed on a computer by websites that a user visits. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site.

Our websites may automatically collect information from a user's computer using Cookies which provide us with limited information. We will use this data primarily for the following purposes:

- enhance and personalize aspects of our service
- show that a user has read any relevant legal information
- analyze how our site is used

The table below explains all the cookies we use and why:

Cookie	Name	Purpose	Website Using These
Tracking and Analytics	_ga, __utma, __utmb, __utmc, __utmz, __utmv, SaneID	These cookies are used to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited.	www.tswinvest.com
Preference Cookies	browser_ack	These cookies collect information that a user has accepted disclaimers on the website. The disclaimers are that the website may not be fully compatible with older versions of internet browsers. The cookie collects this information in an anonymous form and only collects the information that the user has accepted a disclaimer. This information is only retained during your website session and is deleted after you close your browser.	www.tswinvest.com

Most web browsers allow control of most cookies through the browser settings. If at any time you wish to withdraw your consent for cookie usage then please delete the cookies generated by our websites from your browser. Please note that deleting any of these cookies may result in you not being able to enter or use all of the features of our website.