

TRINITY

INVESTMENT MANAGEMENT

PRIVACY POLICY

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| FACTS | WHAT DOES TRINITY INVESTMENT MANAGEMENT, LLC (“TRINITY”) DO WITH YOUR PERSONAL INFORMATION? |
| Why? | 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? | <p>The types of personal information we collect, and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> • Social Security number • account balances • account transactions • transaction history • wire transfer instructions • checking account information <p>When you are no longer our customer, we continue to share your information as described in this notice.</p> |
| 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 Trinity chooses to share; and whether you can limit this sharing. |

| Reasons we can share your personal information | Does Trinity share? | Can you limit this sharing? |
|---|---------------------|-----------------------------|
| For our everyday business purposes – such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus | Yes | No |
| For our marketing purposes – to offer our products and services to you | No | We don't share |
| For joint marketing with other financial companies | No | We don't share |
| For our affiliates' everyday business purposes – information about your transactions and experiences | Yes | No |
| For our affiliates' everyday business purposes – information about your creditworthiness | No | We don't share |
| For our affiliates to market to you | Yes | Yes |
| For non-affiliates to market to you | No | We don't share |

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| Questions? | Call 1-877-334-1283 |
| What we do | |
| Who is providing this notice? | Trinity Investment Management, LLC |
| How does Trinity protect my personal information? | To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings. |
| How does Trinity collect my personal information? | <p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none">• open an account• provide account information• give us your contact information• make a wire transfer• tell us where to send the money <p>We also collect your information from others, such as credit bureaus, affiliates, or other companies.</p> |
| 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 creditworthiness• affiliates from using your information to market to you• sharing for non-affiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing.</p> |
| Definitions | |
| Affiliates | Companies related by common ownership or control. They can be financial and non-financial companies. Our affiliates include: IWP Services, LLC, IWP Capital, LLC and IWP Holdings, LLC |
| Non-affiliates | <p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none">• Trinity doesn't share with non-affiliates so they can market to you. |
| 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">• Trinity doesn't jointly market. |