

PRIVACY POLICY

2019

At Hallmark Capital Management, we understand and appreciate that our clients are concerned about their privacy and the confidentiality and security of information we may obtain from you. We are committed to safeguarding the confidential information of our clients and hold all personal information provided to our firm in strictest confidence. You have entrusted us with your private financial information and we will do everything we can to maintain your trust. This policy describes our approach with respect to your sensitive information while using it to serve you better.

INFORMATION WE COLLECT ABOUT YOU

The nonpublic personal information we collect about you is obtained primarily from the following sources:

- Your account application and other forms and documents you provide to us, whether in writing, in person, by telephone, electronically, or by any other means. This information may include your name, address, social security or taxpayer identification number, employment information, income and assets.
- Your investments and transactions in accounts with us, our affiliates, and other financial institutions. This information may include specific investments, account balances, and cash deposits and withdrawals.

SHARING INFORMATION

It is our policy not to disclose or share nonpublic information about our clients or former clients with anyone, including affiliated or non-affiliated third parties, except as necessary to provide our services to you and as permitted by law which includes:

- Non-affiliated companies with whom we have contracted to provide data processing support and other services on our behalf;
- Non-affiliated companies that provide processing, account maintenance and related services in connection with your investments and other transactions handled by us;
- Affiliated and non-affiliated companies and government agencies, only to the extent permitted or required by law, for legal, regulatory or other purposes.

PROTECTING YOUR PERSONAL INFORMATION

We maintain the confidentiality, security and integrity of your personal information by:

- Restricting access to your nonpublic personal information to those employees with a legitimate business need for the information in order to provide our services to you;
- Maintaining physical, electronic and procedural safeguards that meet or exceed federal and industry standards governing how nonpublic personal information should be stored; and
- Contractually limiting the information sharing ability of non-affiliated companies with whom we share your information.

PRIVACY POLICY UPDATE

From time to time, we may amend our privacy policy. You will receive notice when our privacy policy changes.

CONTACT US WITH PRIVACY QUESTIONS

If you have any questions regarding our privacy policy, please contact us at **(888) 794-7940** or **(973) 808-4144** or send your inquiry to **info@hallcapmgt.com**.