

Qualified Trust Company – Privacy Notice

## 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? The types of personal information we collect and share depend on the product or service you have with us. This information can include: Social Security number and name/address financial information and investment objectives suitability information and investment experience When you are no longer our customer, we continue to share your information as described in this notice.

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 QTC chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does QTC 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	Yes	No
For joint marketing with other financial companies	No	N/A
For our affiliates' everyday business purposes—information about your transactions and experiences	Yes	No
For our everyday affiliates' business purposes—information about your creditworthiness	No	N/A
For nonaffiliates to market to you	No	N/A





Who we are		
Who is providing this notice?	Qualified Trust Company	
What we do		
How does QTC 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 QTC collect my personal information?	We collect your personal information, for example, when you  open an account or transfer an account  update your account or transact in your account  or from your representative regarding your preferences.	
Why can't I limit all sharing?	Federal law gives you the right to limit only:  • sharing for everyday business purposes—information about your creditworthiness  • from using your information to market to you  • sharing to market to you  State laws and individual companies may give you additional rights to limit sharing.	
Definitions		
Affiliates	Companies related by common ownership or control. They can be financial and other companies.  • Nova 401(k) Associates, Administrative Fiduciary Services, 401(k) Administration Management Program, Inc.	
Nonaffiliates	Companies not related by common ownership or control. They can be nonfinancial and companies.  • Our nonaffiliated service providers are obligated to keep the personal information we share with them confidential and use it only to provide services specified by Qualified Trust Company. **	
Joint marketing	Qualified Trust Company does not share personal information with unaffiliated third parties for use in marketing their products or services.	

## Other important information

<sup>\*\*</sup> If you conduct business with Qualified Trust Company through a nonaffiliated investment professional, we may exchange information that we collect with your investment professional or with others they may authorize.