

## HOW WE PROTECT YOUR INFORMATION

At Trust Company of America, we take our role as custodian seriously, providing several layers of state-of-the-art protection for investors and their financial advisors. We invest in industry-leading technology and ongoing employee training to help protect investor assets and ensure the integrity of our end-to-end security.

### THREE PILLARS OF DIGITAL SECURITY

- **Channel protection.** We employ extensive security measures to block any attacker's attempts at entry to the TCA platform. First, we use the strongest firewalls available in the industry to guard the information housed in our servers. In addition, we require strong log-in credentials for authentication. Whenever investor data is transferred digitally, it is protected with a high level of security protocols that leverage robust encryption tools, including 256-bit Secure Socket Layer (SSL) encryption.
- **Transaction monitoring.** TCA Vigilantly reviews transaction data and scans for any abnormal or suspicious activity. We employ pattern analysis and other advanced analytical systems to detect suspicious account activity and deter unauthorized access.
- **Data privacy.** TCA's privacy policies and data governance procedures ensure that only the appropriate person who is servicing your account is allowed to view your data. All employees who handle sensitive information are pre-screened and trained in privacy and security.

### HIGH LEVEL OF SECURITY STANDARDS

TCA is an ISO 27001:2005 certified custodian. ISO 27001:2005 is recognized as a leading international and independent verification process for developing and maintaining an information security management system. The ISO 27001:2005 certification ensures compliance in protecting critical and sensitive data while adhering to the highest levels of security standards.

Our Information Security Program is reviewed by both an independent internal auditor and by our industry regulator. Our comprehensive Information Security Program involves a three-pronged approach to digital security:

### SECURITY PROTOCOLS

- **Authentication** – ensures you are communicating with TCA and prevents a fraudulent computer from impersonating your custodian.
- **Encryption** – scrambles transferred data so that it cannot be read by unauthorized parties.
- **Data integrity** – assures your information can only be accessed by those authorized to do so.

*(continued on the reverse)*

## CYBER LIABILITY INSURANCE PROTECTION

TCA has both a cyber liability policy and a EDP/Electronic Computer Crime policy. These protection plans are designed to cover consumers of technology services or products. Most notably, these cyber liability policies cover TCA's liability for a data breach and/or a loss resulting from dishonest acts of an employee or theft caused by others through the fraudulent use of computer systems, including damage to data.

## OUR VENDOR REVIEW PROCESS

TCA completes a thorough vendor risk assessment before using a vendor's product or service. We take comprehensive steps to ensure that a vendor is maintaining expected quality standards without causing any risks to the company or our customers.

## PROTECTING YOUR PRIVACY

At TCA, your privacy is always a high priority. To protect your personal information from unauthorized access and use, we use comprehensive security measures that comply with federal law. In addition, TCA's privacy policy ensures that your personal information is never sold to either affiliates or non-affiliates for marketing purposes. We inform you how we collect, share and protect your personal information in our written privacy policy. This privacy policy is provided to all account holders at account opening and an updated policy is provided at least annually after that. It can also be found on our website at [trustamerica.com](http://trustamerica.com).



## YOUR SAFETY IS OUR BUSINESS

At Trust Company of America, we have a strong culture of risk management. We continuously monitor our systems and controls, and work collaboratively with government agencies, law enforcement and other financial services firms to address potential threats. In addition, we regularly review, update and modify our policies and procedures to respond to new threats and to adapt to changes in technology.

Keeping your financial and personal information secure and confidential is one of our most important responsibilities. You can have the highest level of confidence that your personal and financial information is always protected at TCA.

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1. The portfolio composition is subject to change over time. Trust Company of America does not recommend or endorse any securities or investment strategies. Trust Company of America acts as an asset custodian and does not offer investment advice.