PRIVACY PLEDGE

We are honored by your decision to include us in your financial life and by the trust that you have placed in TD Capital. Because the nature of our advisory relationship necessitates that we possess certain personal and financial information about our clients, we hold ourselves to the strictest standards of confidentiality and privacy. Your trust in us is built on your belief that we will act responsibly in your best interests; therefore, we would like to share with you the actions that we take to safeguard your private information.

First and foremost, we have never and will never sell past, present, or future client information of any type to anyone.

The information to which we are privy through our advisory relationship is used solely by us to manage your portfolio and to best serve your needs.

Types of Information Collected

To set up your brokerage accounts and to understand how we can best manage your investment portfolio, we have gathered the following types of information from you:

- Name and address
- Social Security Number or Taxpayer Identification Number
- Date of birth
- Income
- Cash flow needs
- Tax history/needs
- Investment goals
- Assets
- Accounts at other institutions (when applicable)

Informing You

We will send you our privacy policy annually as required by federal law. Our privacy policy has been developed so that we may best serve your needs. If you would like to discuss any of these issues with us or feel that you could be made more comfortable in any way, please give us a call at (901) 681-0021. We would love to hear from you.

Information Disclosure

As stressed above, we do not and would not ever sell any information about you. Furthermore, we do not share any information with non-affiliated third parties unless necessary to fulfill your request or to work in your best interests. These are the only instances when we would consider revealing your information to another:

- At your request only, we will work with your tax preparer, attorney, mortgage or lending agent, etc. to assist him/her in procuring the information you wish to have shared. Please let us know if you are working with someone who may require your investment information.
- In addition to your relationship with TD Capital, you have, also, become a client of Fidelity, the custodian of your brokerage account. On occasion, in order to service your account, we are required to work with a Fidelity customer service team. To them, we will reveal only the minimum information required to accomplish our task. As you are also subject to privacy issues through your relationship with Fidelity, please refer to their website to learn more about how they protect your privacy.
- In limited circumstances, we may release information when disclosure is required by law, such as to government regulators or law enforcement agencies.

Protecting Your Information

We have adopted a number of safeguards to protect your private personal and financial information. We maintain physical, electronic and procedural safeguards that comply with federal regulations. For example:

- All of our computer files are located on a secured, cloud-based virtual drive. Only we are able to access them.
- By limiting access to our offices, we can limit the possibility of unauthorized access to your information. Our figurative door is **always** open to you if you would like to visit.
- We use the Shred-It program to destroy (and recycle) all sensitive documents and paperwork**.**

Effective 2/15/13