



Last modified: February 2015

When you do business with Tompkins Charitable Gift Fund, Inc. (“we”, “our” or “us”), you expect that your personal information will be kept private and confidential. At Tompkins Charitable Gift Fund, Inc., we are committed to maintaining your privacy and safeguarding your account, transaction, and non-public personal information. Such information is considered confidential. If you terminate your relationship with Tompkins Charitable Gift Fund, Inc., your information will still be kept confidential. Tompkins Charitable Gift Fund, Inc. does not sell, rent, loan or otherwise share (except as disclosed below) any information about its customers.

The following privacy policy (this “**Privacy Policy**”) explains how we collect, use, disclose and transfer the information you provide when you interact with us. This Privacy Policy covers customer information (“**Customer Information**”), which means identifiable information about a consumer or a consumer’s current or former customer relationship with Tompkins Charitable Gift Fund, Inc. When you donate to Tompkins Charitable Gift Fund, Inc., use our services and/or have contact with our employees, you may provide us with Customer Information, including, without limitation, your name, mailing and email addresses, other contact information, Social Security number, and/or financial information.

Please read this Privacy Policy carefully to understand our policies and practices regarding your Customer Information and how we will treat it. By using our services, you signify your agreement to the terms of this Privacy Policy. If you do not agree to the terms of this Privacy Policy, please do not use our services. Tompkins Charitable Gift Fund, Inc. may amend this Privacy Policy at any time. If Tompkins Charitable Gift Fund, Inc. makes a change to this Privacy Policy, then we will inform you of these changes, as required by law. To receive the most up-to-date Privacy Policy, you can call us at 888-828-0099. You agree that your continued use of our services will constitute your consent to the revisions.

### **Obtaining Customer Information**

We collect and use various types of Customer Information about you and your accounts to service your accounts, better respond to your needs and manage our business and risks. Customer Information is categorized in the following six ways:

- 1. Identification Information-** information that identifies you, such as name, address, telephone number and Social Security number.
- 2. Applicable Information-** information which you provide to us on applications and through other means that will help us determine if you are eligible for products you request.

- 3. Other General Information-** information from outside sources, such as data from public records, that is not assembled or used for the purpose of determining eligibility for a product or service. As required by the USA PATRIOT Act, we also collect information and take actions necessary to verify your information.

We will not disclose your Customer Information to any third party, except in the following circumstances:

- as expressly authorized by you or your representative;
- to fulfill the purpose for which you provide it to Tompkins Charitable Gift Fund;
- to comply with applicable laws, court orders or other valid legal processes, to protect the rights, property or safety of Tompkins Charitable Gift Fund, our customers or others;
- to our subsidiaries and affiliates;
- to contractors, service providers or other third parties designated by Tompkins Charitable Gift Fund for the limited purpose of providing you with the services or information you requested;
- to a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of our assets.

#### **Disclosing Customer Information to Our Affiliates**

Tompkins Charitable Gift Fund, Inc. may disclose Customer Information among its Affiliates for our everyday business purposes - such as to process your transactions, maintain your accounts, respond to court orders and legal investigations, or otherwise as required by law. We may share information about your transactions and experiences, and for our affiliates to offer and provide you with additional products and services that our affiliates may offer.

#### **Disclosing Customer Information to Non-affiliated External Organizations**

Tompkins Charitable Gift Fund's policy is to not share your Customer Information with non-affiliated external organizations except for everyday business purposes, such as to process transactions, maintain accounts, respond to court orders and legal investigations or otherwise as required by law. We may disclose any of the Customer Information we collect, as described in the section entitled Obtaining Customer Information, to companies that perform marketing services on our behalf or to other financial institutions with whom we have joint marketing agreements. Such organizations will be contractually required to conform to our privacy standards.

#### **Employee Access To Customer Information**

Employees of Tompkins Charitable Gift Fund, Inc. may be given access to Customer Information in the normal course of business. No employee of Tompkins Charitable Gift Fund, Inc. is permitted to use or disseminate any Customer Information except as required for the normal performance of his or her job. Tompkins Charitable Gift Fund, Inc. informs and trains its employees stressing the importance of confidentiality and customer privacy.

#### **Keeping Your Customer Information Accurate**

Tompkins Charitable Gift Fund, Inc. has established procedures to ensure that the Customer Information you provide is maintained in an accurate, current, and complete manner. Should you notify us of any errors or

changes in your information, we will promptly correct or update it. We maintain physical, electronic, and procedural safeguards that comply with federal standards to secure your nonpublic personal information.

### **Opt-Out Notification**

Tompkins Charitable Gift Fund, Inc. may disclose non-exempted, nonpublic personal information, including transaction and experience information, to its affiliates for solicitation or marketing additional products and services. You may elect to opt out of such disclosure by notifying us by e-mail, mail or by phone at:  
Info@TompkinsCharitableGift.org

This request to opt out will remain in effect as long as you are a customer of Tompkins Charitable Gift Fund, Inc. or you notify us otherwise. Tompkins Charitable Gift Fund's practice is to permit each joint donor advised account holder to opt out separately. A joint donor advised account holder is also permitted to act on behalf of all other joint donor advised account holders.

### **Revisions and Contact**

The date this Privacy Policy was last modified is identified at the top of the first page. You are responsible for ensuring that you periodically review this Privacy Policy, including any revised versions that we provide to you.

If you have any questions or concerns about our Privacy Policy, please contact us by e-mail, mail or by phone at:

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888-828-0099

[www.TompkinsCharitableGift.org](http://www.TompkinsCharitableGift.org)