

TFO PHOENIX, INC. PRIVACY POLICY NOTICE

TFO Phoenix, Inc. (TFO Phoenix) is committed to client confidentiality and the protection of your privacy. The following information is provided, as required by law, to help you understand our privacy policy and how we will handle and maintain confidential personal information as we fulfill our obligations to protect your privacy. "Personal information" refers to the nonpublic financial information obtained by TFO Phoenix in connection with carrying out our services.

INFORMATION WE COLLECT

TFO Phoenix collects personal information as part of our relationship to you, to provide client services and fulfill legal and regulatory requirements. The type of information TFO Phoenix collects may include:

- Information TFO Phoenix receives from you on forms (such as name, address, Social Security number, profile documents, assets and income);
- Information you provide TFO Phoenix directly about your personal finances or personal circumstances or which TFO Phoenix may receive from brokerage statements or other information you authorize TFO Phoenix to receive.

INFORMATION DISCLOSED IN ADMINISTERING PRODUCTS AND SERVICES

TFO Phoenix will not disclose personal information about current or former clients to non-affiliated third parties except as permitted or required by law or with consent. Because we rely on certain third parties for services that enable us to provide our advisory services to such as our attorneys, auditors, other consultants, brokers, and custodians who, in the ordinary course of providing their services to, may require access to information, may share non-public personal information with such third parties. TFO Phoenix does not sell any personal information about you to any third party.

Information we may share may include your name, address, social security number, assets, income, investment holdings and other financial information.

PROCEDURES TO PROTECT CONFIDENTIALITY AND SECURITY OF YOUR PERSONAL INFORMATION

TFO Phoenix has procedures in place that limit access to personal information to those employees who need to know such information in order to perform business services. In addition, TFO Phoenix maintains physical, electronic and procedural safeguards to guard your nonpublic personal information.

TFO Phoenix will update its policy and procedures when necessary to ensure that your privacy is maintained and that TFO Phoenix conducts business in a way that fulfills our commitment to you. If TFO Phoenix makes any material changes in its privacy policy, we will make that information available to clients through our Web site and/or other communications.

INFORMATION WE DISCLOSE TO AFFILIATED THIRD PARTIES

TFO Phoenix may share client non-public personal information with our affiliated law firm, Husch Blackwell, LLP and our affiliated investment adviser TFO-TDC, LLC. TFO Phoenix may also share client information with BridgePoint Risk Management, LLC, an affiliated insurance agency, and PandoTree Trust Company, LLC, an affiliated trust company.

FORMER CLIENTS

If you decide to close your account(s) or become an inactive customer, we will adhere to our privacy policies, which may be amended from time to time.

CHANGES TO OUR PRIVACY POLICY

In the event there were to be a material change to our privacy policy regarding how we use your confidential information, we will provide written notice to you. Where applicable, you would be given an opportunity to limit or opt-out of such disclosure arrangements.

QUESTIONS

If you have questions about this privacy notice or about the privacy of your customer information call our main number 602-466-2611 and ask to speak to the Chief Compliance Officer.