

OLD DOMINION

CAPITAL MANAGEMENT, INC.



Rev: June 2020

FACTS

WHAT DOES OLD DOMINION CAPITAL MANAGEMENT, INC. DO WITH YOUR PERSONAL INFORMATION?

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, birth dates, and employment status
- Account numbers, account balances, income, transaction history, and financial history
- Personal addresses, phone numbers, and email addresses

How?

All financial companies need to share clients' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their clients' personal information; the reasons Old Dominion Capital Management, Inc. ("ODCM") chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does ODCM 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	NO
For our affiliates' everyday business purposes— information about your transactions and experiences	YES	NO
For our affiliates' everyday business purposes— information about your creditworthiness	NO	NO
For our affiliates to market to you	NO	NO
For nonaffiliates to market to you	NO	NO

Questions? call us at:

- Call our Chief Compliance Officer at (800) 446-2029, or
- Email our Chief Compliance Officer at info@odcm.com, or

Please note:

If you are a new client, we can begin sharing your information from the date we sent this notice. When you are *no longer* our client, we continue to share your information as described in this notice.

Who we are

Who is providing this notice?

Your investment advisory firm, Old Dominion Capital Management, Inc. ("ODCM").

What we do

How does ODCM 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. Our employees are bound by our Code of Business Conduct and Ethics and policies when accessing your personal information.

How does ODCM collect my personal information?

We collect your personal information when you:

- Enter into an investment advisory contract
- Open an account
- Provide account information
- Give us your contact information
- Give us your income information

We may also collect your personal information from other companies, like your custodian, banker, accountant or lawyer with your consent.

Why can't I limit all sharing?

Federal law gives you the right to limit only

- sharing for affiliates' everyday business purposes—information about your creditworthiness
- affiliates from using your information to market to you
- sharing for nonaffiliates to market to you

Individual service providers may give you additional rights to limit sharing. In addition to federal law, you may have other privacy protections under some state or international laws. We will comply with all applicable laws as to information about you, including medical information.

Definitions

Affiliates

Companies related by common ownership or control. They can be financial and nonfinancial companies.

ODCM is a subsidiary of Atlantic Union Bank.

Nonaffiliates

Companies not related by common ownership or control. They can be financial and nonfinancial companies.

ODCM does not share with nonaffiliates so they can market to you. Nonaffiliates we can share with for business purposes include government entities, software developers, service providers, or consulting firms.

Joint marketing

A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

ODCM doesn't jointly market.