

| FACTS | WHAT DOES CIBC PRIVATE WEALTH MANAGEMENT DO WITH YOUR PERSONAL INFORMATION |
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| 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? | <p>The types of personal information we collect and share can include:</p> <ul style="list-style-type: none"> ▪ Social Security number and account balances ▪ Account transactions and checking account information ▪ Transaction history and wire transfer instructions |
| How? | All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information, the reasons we choose to share and whether you can limit this sharing. |

| Reasons we can share your personal information | Does CIBC PWM share? | Can you limit this sharing? |
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| For our everyday business purposes—such as to process your transactions, maintain your account(s), or respond to court orders and legal investigations | Yes | No |
| For our marketing purposes—to offer our products and services to you | Yes | No |
| For joint marketing with other financial companies | No | We don't share |
| 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 | We don't share |
| For our affiliates to market to you | Yes | Yes |
| For nonaffiliates to market to you | No | We don't share |

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| Choices to limit our sharing | <p>Call toll-free: US and Canada: 844-204-5271 Outside US/Canada: 212-408-9740 Email: cibcpwm.privacy@cibc.com</p> <p>Please note: If you are a new customer, we can begin sharing your information 30 days from the date we sent this notice. When you are no longer our customer, we continue to share your information as described in this notice; however, you can contact us at any time to limit our sharing.</p> |
| Questions? | Please contact your CIBC Private Wealth Management relationship manager, or visit https://private-wealth.us.cibc.com |

| Who We Are | |
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| Who is providing this notice? | The following entities are all part of CIBC Private Wealth Management: CIBC National Trust Company; CIBC Private Wealth Advisors, Inc.; CIBC Delaware Trust Company; and CIBC Private Wealth Group, LLC., collectively referred to as CIBC PWM. |
| What We Do | |
| How does CIBC PWM protect my personal information? | To protect your information from unauthorized access and use, we use security measures that comply with federal law. Those measures include computer safeguards and secured files and buildings. |
| How does CIBC PWM collect my personal information? | <p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> ▪ Open an account ▪ Tell us about your investment or retirement portfolio ▪ Seek financial or tax advice ▪ Make a wire transfer ▪ Enter into an investment advisory contract <p>We also may collect your personal information from others, such as affiliates or other companies.</p> |
| Why can't I limit all sharing? | <p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> ▪ sharing for affiliates' everyday business purposes—information about your creditworthiness ▪ sharing for affiliates to market to you ▪ sharing for nonaffiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.</p> |
| What happens when I limit sharing for an account I hold jointly with someone else? | Your choices will apply to everyone on your account. |

| Definitions | |
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| Affiliates | Companies related by common ownership or control. They can be financial or nonfinancial companies. Our affiliates include CIBC Bank USA and other companies with "CIBC" in their name. |
| Nonaffiliates | Companies not related by common ownership or control. They can be financial and nonfinancial companies. CIBC PWM does not share with non-affiliates so they can market to you. |
| Joint Marketing | A formal agreement between nonaffiliated financial companies that together market financial products or services to you. CIBC PWM does not jointly market. |

| Other Important Information | |
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| For California, Connecticut, and Vermont residents: We will limit sharing among our affiliates to the extent required by your state's laws, unless you authorize us to make those disclosures. | |