HUDSON VALLEY INVESTMENT ADVISORS, INC.
A subsidiary of Orange County Bancorp, Inc.

| Facts | WHAT DOES HUDSON VALLEY INVESTMENT ADVISORS, 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:**<br>■ Social Security number and income<br>■ Assets and retirement assets<br>■ Investment experience and risk tolerance |
| **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 Hudson Valley Investment Advisors, Inc. chooses to share; and whether you can limit this sharing.** |

| Reasons we can share your personal information | Does Hudson Valley Investment Advisors, Inc. share? | Can you limit this sharing? |
|---|---|---|
| **For our everyday business purposes:** such as processing your transactions, maintaining your account(s), responding to court orders and legal investigations or to | Yes | No |
| **For our marketing purposes:** to offer our products and services to you | Yes | Yes |
| **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 | Yes |
| **For our affiliates' everyday business purposes:** information about your creditworthiness | Yes | Yes |
| **For our affiliates to market to you** | Yes | Yes |
| **For non-affiliates to market to you** | No | We don't share |

| To limit our sharing | **Call toll-free at (800) 925-4572 to notify us of your choice(s)**<br><br>**Please Note**:<br>If you are a new customer, we can begin sharing you information 30 days from the date we sent you this notice. When you are no longer our customer, we continue to share your information as described in this notice.<br><br>However, you can contact us at any time to limit our sharing |
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## Questions?

Call us toll- free at (800) 925-4572

## What we do

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| **How does Hudson Valley Investment Advisors, Inc. protect my financial 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** |
| **How does Hudson Valley Investment Advisors, Inc. collect my personal information?** | **We collect your personal information, for example, when you:**<br>■ open an account or seek advice about your investments<br>■ enter into an investment advisory contract<br>■ tell us about your investment or retirement portfolio<br>■ give us your contact information |
| **Why can't I limit all sharing?** | **Federal law gives you the right to limit only**<br>■ sharing for affiliates' everyday business purposes, information about your creditworthiness<br>■ affiliates from using your information to market to you<br>■ sharing for non-affiliates to market to you<br>**State laws and individual companies may give you additional rights to limit sharing** |
| **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 and non-financial companies**<br>■ Our affiliates include financial companies such as Orange County Bancorp, Inc. and Orange Bank & Trust Company |
| **Non-affiliates** | **Companies not related by common ownership or control. They can be financial and non-financial companies**<br>■ Hudson Valley Investment Advisors, Inc. does not share with non-affiliates so they can market to you |
| **Joint Marketing** | **A formal agreement between non-affiliated financial companies that together market financial products or services to you**<br>■ Hudson Valley Investment Advisors, Inc. doesn't jointly market |

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