



PRIVACY NOTICE FOR CALIFORNIA CONSUMERS

Last updated: January 1, 2020

This notice contains disclosures required by the California Consumer Privacy Act (“CCPA”), is only relevant to residents of California, and applies only to the collection or other use of “personal information” that is subject to the CCPA.

Information We Collect. In the past 12 months, we have collected the following categories of personal information about California consumers:

Category	Examples	Collected
A. Identifiers	A real name, alias, email address, postal address, Internet Protocol (IP) address, account name, Social Security number, driver’s license number, passport number, or other similar personal identifiers.	YES
B. Other personal information categories, as listed in the California Customer Records statute	A signature, physical characteristics or description, telephone number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.	YES
C. Protected classification characteristics under California or federal law	Age (40 years or older), race, citizenship, marital status, sex, veteran or military status.	YES
D. Commercial information	Account activity, records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES
E. Biometric information	Fingerprints, faceprints, voiceprints, and iris or retina scans.	NO
F. Internet or other similar network activity	Browsing history, search history, information on a consumer’s interaction with a website, application, or advertisement.	NO
G. Geolocation data	Physical location or movements.	NO
H. Sensory data	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
I. Professional or employment-related information	Current or past job history or performance evaluations.	YES
J. Non-public education information	Education records directly related to a student maintained by an educational institution or party acting on its behalf.	NO
K. Inferences drawn from other personal information	Profile reflecting a person’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	YES

We do not knowingly collect or solicit personal information from anyone under the age of 18.

We collect personal information from the following categories of sources:

- Your communications with us;
- Your and our service providers, including but not limited to: administrators, custodians, brokers, auditors, law firms, accountants, consultants, employment agencies, credit bureaus, other financial institutions;
- Your employer and your employer's service providers; and
- Government entities.

Use of Personal Information. We may use the personal information we collect for one or more of the following purposes:

- Providing you with information about our products and services;
- Providing performance and other updates;
- One or more of the following business purposes:
 - Performing services (for us or our or your service providers) such as account servicing, processing orders and payments, and analytics;
 - Auditing related to our interactions with you;
 - Legal compliance;
 - Detecting and protecting against security incidents, fraud, and illegal activity;
 - Internal research for technological improvement;
 - Internal operations;
 - Activities to maintain and improve our services; and
 - Short-term, transient use, provided that the personal information is not disclosed to another third party and is not used to build a profile about a consumer.
- Other commercial purposes, including, but not limited to activities that are undertaken to advance, enable or effect potential commercial transactions.

Sharing Personal Information. We may provide personal information to:

- Yours or our service providers, including but not limited to: administrators, custodians, brokers, auditors, law firms, accountants, consultants, employment agencies, credit bureaus, other financial institutions;
- Your employer and your employer's service providers;
- Affiliates;
- Business partners;
- Legal or government regulatory authorities as required by applicable law; and
- In connection with any potential business transfer.

In the past 12 months, we have not sold any personal information we collect to third parties, and we have shared the categories of personal information we collect only as set forth above.

Rights of California Consumers. The CCPA provides a California consumer the following rights, subject to certain exceptions and limitations:

- The right to request (a) the categories and specific pieces of personal information we collect, use, disclose, and sell about you, (b) the categories of sources from which we collected your personal information, (c) our purposes for collecting or selling your personal information, (d) the categories

of your personal information (if any) that we have either sold or disclosed for a business purpose, and (e) the categories of third parties with which we have shared personal information;

- For certain categories of personal information, the right to request a list of what personal information (if any) we disclosed to third parties for their own direct marketing purposes in the past 12 months and the names and addresses of those third parties;
- The right to request that we delete the personal information we have collected from you or maintain about you;
- The right to opt out of our sale(s) (if any) of your personal information; and
- The right not to receive discriminatory treatment for the exercise of the privacy rights conferred by the CCPA.

You may submit requests relating to your exercise of rights under the CCPA to us:

- via phone (855) 636-4357; or
- email CCPAinquiries@iconiqcapital.com.