

## LOS ANGELES CAPITAL

### PRIVACY NOTICE FOR CALIFORNIA RESIDENTS

Los Angeles Capital Management LLC (“**Los Angeles Capital**”, “**we**”, “**us**” and “**our**”) is committed to safeguarding the privacy of our clients, prospects, vendors and visitors to [www.lacapm.com](http://www.lacapm.com). This Privacy Notice for California Residents (“**Privacy Notice**”) supplements our Privacy Policy (available [here](#)), and applies to visitors, users and others, including visitors to [www.lacapm.com](http://www.lacapm.com) (our “**Site**”), to our offices and other interactions with us, who reside in the State of California (“**Consumers**” or “**you**” or “**your**”). This Privacy Notice does not apply to individuals applying for employment with us in the context of their role as applicants, or to our personnel in their capacity as personnel. If you are a client, former client, or customer who has received a financial product or service from us, our processing of your non-public financial personal information is not subject to this Privacy Notice – see our Privacy Policy for more information.

#### About this Privacy Notice

Please take the time to read and understand this Privacy Notice. Pursuant to the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 (“**CCPA**”), this Privacy Notice describes the types of Personal Information Los Angeles Capital collects and how we use and disclose this information. “**Personal information**” is information that directly or directly identifies you or is reasonably capable of being associated with you as further defined by the CCPA.

We may provide supplemental privacy notices and/or disclosures on specific occasions, which should be read together with this Privacy Notice and our Privacy Policy.

#### Personal information that we collect about you

The Personal Information we collect about you may vary depending on your interactions with us. We may collect Personal Information directly from you, such as when you fill out a webform or create an account; from your interactions with our Site; from our affiliates; or from third party sources such as credit reporting agencies.

We have collected the following categories of Personal Information from Consumers within the last twelve months:

- **Identifiers**, such as name, alias, home and work postal address, home and work email address, work and mobile phone number, employment and employment history, job title, Internet Protocol address, account name and digitized signature.
- **Characteristics of legally protected classifications**, such as age (40 years or older) and gender.
- **Internet or other electronic network activity information**, such as browsing history, search history, and information on a Consumer's interaction with a website or application, including when you enter and leave the Site, the site or webpage you visited before visiting our Site, and the number of times you visit our Site.
- **Sensory data**, such as audio voice and security video recording, electronic, visual, or similar information.
- **Other information that directly or indirectly identifies you**, such as physical appearance and description such as through office video security recording.

## Uses of Personal Information

We, or our vendors, may collect the above categories of Personal Information for the purposes described in the Privacy Policy, including for the following purposes:

- To maintain, administer, and provide our products, services and the Site, including to fulfill your requests, and offer the features and functionalities of the Site, and products and services.
- For operational purposes in support of maintaining, administering, and providing the Site, such as troubleshooting.
- To perform our obligations and exercise our rights under a contract that Los Angeles Capital has entered into with you or your organization.
- To communicate with you, including to respond to your questions or other requests, provide you with information on products or services that you request, and notify you about changes to our site, policies, terms, products or services.
- To provide customer support.
- Detecting, protecting against, and prosecuting security incidents and fraudulent or illegal activity.
- Bug detection, error reporting, and activities to maintain the quality or safety of our service.
- Improving our existing service and developing new products and services.
- To verify your identity.
- To market ourselves and our products and services to you (subject to any opt-out preferences you have communicated to us).
- For examination or event registration, scheduling, administration and related purposes.
- To comply with applicable laws (for example, to comply with recordkeeping, reporting, and tax), respond to law enforcement requests (for example, to comply with a search warrant, subpoena or court order), or to carry out professional ethics/conduct investigations.
- To protect our legal rights.
- To analyze the use of the Site, products and services for internal purposes.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which Personal Information held by us is among the assets transferred.
- In any other way with your consent.

For the avoidance of doubt, we do not process sensitive personal information as that term is defined under the CCPA for any purpose other than to provide the Services or as required by applicable law.

## Disclosure of Personal Information

We may disclose Personal Information for any of the above business and operational purposes to the following parties and in the following circumstances.

- **Internally** to our personnel on a need-to-know basis.
- To our **affiliates**, such as our subsidiaries.
- To our **service providers and other vendors** that provide services to us, such as fund administrators, transfer agents, brokers, law firms, accountants, consultants, auditors, and other professional advisors; technology and communication service providers, such as web hosting, email, and software providers; event management and venue providers; identity management providers (e.g., authentication software providers); and an analytics provider, which is our service provider.
- For **legal compliance and to exercise legal rights**, including when required to do so by law, regulation, or court order or in response to a request for assistance by the police or other law enforcement agency; and to seek legal advice from our external lawyers or in connection with litigation with a third party.
- For **business transaction purposes**, such as to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which Personal Information is among the assets transferred.

The CCPA places certain obligations on businesses that “sell” Personal Information to third parties or “share” Personal Information with third parties for cross-context behavioral advertising as those terms are defined under the CCPA. We do not “sell” or “share” the Personal Information covered by this Privacy Notice and have not done so in the twelve months prior to the effective date of this Privacy Notice.

## Retention of Personal Information

The length of time we retain your Personal Information may vary based on the type of information and the purposes it serves, and applicable laws and regulations. We retain Personal Information for the purpose for which the Personal Information is collected or used.

## Your rights under the CCPA

You have certain rights under the CCPA with regard to your Personal Information. You may request that we:

- Disclose to you the categories of Personal Information we collected about you in the past 12 months, the categories of sources from which we collected such Personal Information, our business or commercial purpose for collecting such Personal Information, and the categories of third parties to whom we disclosed that Personal Information. We have provided this information above in the Privacy Notice. You also have the right to request that we disclose the categories of third parties which we “sold” or “shared” Personal Information, but we do not “sell” or “share” Personal Information as defined in the CCPA.
- Provide you with the specific pieces of Personal Information we collected about you in a commonly used, machine-readable format (where technically feasible).

- Correct inaccurate Personal Information that we hold about you.
- Deletion or removal of your Personal Information.

You also have the right not to be discriminated against (as provided for in California law) for exercising your rights.

There are certain exceptions to these above rights. For instance, we may retain your Personal Information if it is reasonably necessary for us or our vendors to provide a service that you have requested or to comply with law or to detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity or prosecute those responsible for that activity.

**Exercising your rights:** To exercise the rights described above, please submit a verifiable Consumer request to us by either: sending an email to [privacy@lacapm.com](mailto:privacy@lacapm.com) or calling (888) 531-0306. Please note:

- Only you, or a person registered with the California Secretary of State which you authorize to act on your behalf, may make a request related to your Personal Information.
- Your request must: (1) provide sufficient information that allows us to reasonably verify you are the Consumer about whom we collected Personal Information, or an authorized representative of such Consumer, and (2) describe your request with sufficient detail that allows us to properly understand, evaluate and respond to it.
- We must be able to verify your identity to respond to your request or verify that you have authority to make the request on a Consumer's behalf. We will only use Personal Information provided in a verifiable Consumer request to verify the requestor's identity or authority to make the request.

**Verification Process:** We verify Consumer requests by sending an email to you at the email address we have for you on file, by using other identifying information we have on file, or by using a third-party identity verification service. The email will ask you to respond to verify you are the Consumer making the request. We will respond to your requests as required by the applicable law.

### **“Shine the Light” Disclosure**

The California “Shine the Light” law gives you the right to opt out of the sharing of certain categories of personal information (as defined in the Shine the Light law) with third parties for their own direct marketing purposes. We do not share personal information with third parties for their own direct marketing purposes.

### **Changes to Our Privacy Notice**

Our current Privacy Notice, and our Privacy Policy, will be posted on our Site and any updates will be effective upon posting. You are responsible for periodically checking this Site for updates. We reserve the right to amend this Privacy Notice at our discretion and at any time. If you use our Site or continue to use our services after any changes to the Privacy Notice have been posted, that means you agree to the updated Privacy Notice.

## Contacting us

If you would like further information on our Privacy Notice, please contact us at [privacy@lacapm.com](mailto:privacy@lacapm.com), or write to us at 11150 Santa Monica Blvd, Suite 200, Los Angeles, CA 90025, Attn: Compliance-Privacy.

You may find more information about your rights on the State of California Department of Justice's website available [here](#).

Updated: December 22, 2022