

CresAlta Investment Management, Inc.

PRIVACY NOTICE FOR CALIFORNIA RESIDENTS

This Privacy Notice for California Residents (“Notice”) supplements CresAlta Investment Management Inc.’s Privacy Notice and applies to individuals who reside in California (“California residents,” “you” or “your”). CresAlta has adopted this Notice for all its subsidiaries and affiliates (collectively, “CresAlta,” “we” and “our”) whose activities fall within the scope of the California Consumer Privacy Act, as amended (“CCPA”). CresAlta adopts this Notice to comply with the CCPA.

The CCPA, and this disclosure, does not apply to information that is publicly available from government records, deidentified or aggregated, or covered by other privacy laws, such as the federal Gramm-Leach-Bliley Act, or certain other laws.

CresAlta does not sell or share personal information, as defined by the CCPA.

Personal information CresAlta collects

In the past 12 months, CresAlta has collected the following categories of personal information relating to California residents:

- Identifiers, such as a real name, alias, postal address, email address, telephone number, IP address, and sensitive personal information, including certain government identifiers (such as your Social Security number, driver’s license, passport number); an account log-in, financial account, debit or credit card number with any security or access code, password or other account access credentials; or contents of mail, email and text messages
- Financial and commercial information, including records of personal property, bank account numbers, products or services purchased, obtained or considered, and other purchasing or consuming histories or tendencies
- Characteristics of protected classifications, such as age, gender, and marital status
- Internet or other electronic network activity information, including browsing history, search history, and information regarding your interaction with an internet website, application and advertisement
- Personal data about business professionals related to our business-to-business clients, vendors, and partners in the context of our business relationships with those companies
- Information for employment or professional purposes, including current and past job history
- Geolocation data

Sources

We collected the categories of personal information listed above from the following categories of sources:

- Directly from you or those acting on your behalf
- Directly and indirectly from activity on our website, applications and advertisements
- Other sources, such as our affiliated entities, credit and insurance information bureaus, and references you have provided

Purposes

The business or commercial purposes for which personal information was collected, used or disclosed within the past 12 months include:

- Conducting our business and providing our products and services, including supporting, managing and improving our products and services, and, where necessary, to verify your identity
- Supporting our operations, including communicating with you, fulfilling and responding to your inquiries and requests, monitoring and improving our responses, and carrying out the purposes for which you provide your personal information
- Marketing and promotional events
- Meeting our legal and compliance obligations, including monitoring and reporting, supporting our information security and fraud prevention programs, performing due diligence, supporting audit, investigations, and legal requests, and complying with our internal policies, procedures, and contractual obligations
- Helping maintain the safety, security, and integrity of our business, including our products and services, and to respond, where necessary, to requests from regulators or as otherwise required by applicable law, regulation, or similar demand

Third parties

The categories of third parties with whom personal information was disclosed for business purposes within the past 12 months:

- Credit reporting agencies
- Service providers, such as payment service providers and third-party service vendors
- Third parties to whom you direct or authorize CresAlta to disclose your personal information, independent of or in connection with products and services we provide to you
- Our lawyers, auditors and other outside professional consultants, subject to confidentiality

Retention period

CresAlta will retain your personal information for as long as is required to (i) provide the services to you or the institution you represent, (ii) fulfill the purposes for which the data was collected, (iii) comply with our legal/regulatory obligations and/or (iv) comply with our internal data retention policies that apply to your personal information.

Your rights and choices

If you are a California resident, you have the right to:

Request we disclose

- the categories of personal information that we collected about you
- the categories of sources from which your personal information was collected
- the categories of third parties with whom we disclosed that personal information
- the purpose for collecting, using or disclosing personal information about you

- the specific pieces of personal information we collected about you

Request we delete certain of your personal information that we collected and retained, unless the CCPA recognizes an exception

Request correction of collected personal information that is inaccurate

Be free from unlawful discrimination for exercising your CCPA rights

Exercising your rights

If you are a California resident, or an authorized agent acting on behalf of a California resident, you may exercise your rights by calling 303.498.9699 or going to www.cresalta.com/contact/.

Once we receive your request, we will verify your identity or authority to make the request. We follow our standard client identification procedures to verify requests. Where possible, we will only use personal information that CresAlta already stores for verification. Please provide us with the following information when you submit your request (we may require additional information):

- Name
- Account number (if available)
- Email address

After verification, we will review your request and respond with the corresponding information or the basis for denial.

Authorized agents – an authorized agent is a person or entity that you have authorized to act on your behalf. If you are an authorized agent and submit a request on behalf of a California resident, we may require that the California resident provide you with written authorization to make the request on their behalf and verify their own identity directly to us.

Individuals under 16 years of age

We do not knowingly share or sell personal information of California residents under 16 years of age, as defined by the CCPA.

Use and disclosure of sensitive personal information

You do not have a right to limit our use and disclosure of sensitive personal information because we do not collect or process sensitive personal information to infer characteristics about an individual.

More information

For questions and more information, you can call us at 303.498.9699 or reach out by going to www.cresalta.com/contact/.

View CresAlta's privacy policy at <https://www.cresalta.com/security-privacy/>