

Privacy Notice For California Consumers

Last updated: April 11, 2023

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. Consumers with disabilities may access this notice by downloading or printing the notice from [www.brahman.com/CCPA-Privacy-Notice.pdf].

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, 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, bank account number, or any other financial 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. Professional or employment-related information	Current or past job history or performance evaluations.	YES
E. Sensitive Personal Information	Personal information that reveals social security number, driver’s licenses, state identification card, or passport number, racial or ethnic origin, religious or philosophical beliefs, or union membership.	YES

We collect personal information from the following categories of sources:

- Your communications with us; and
- Service providers, including, but not limited to: administrators, lenders, banks, brokers, auditors, law firms, consultants, placement agents; and

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 service provider) such as account servicing, processing orders and payments, and analytics;
- Legal compliance; and
- Internal operations;

Retention of Personal Information. We retain the personal information collect, including sensitive personal information, for at least as long as is required by the Investment Advisers Act of 1940 or other applicable regulations.

Disclosing Personal Information. We may disclose personal information in one or more of the categories identified above to:

- Service providers, including but not limited to: administrators, lenders, banks, brokers, auditors, law firms, consultants, and placement agents;
- Affiliates;
- Business partners; and
- Legal or government regulatory authorities as required by applicable law.

Sharing Personal Information. The CCPA defines sharing as the sharing, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer’s personal information by the business to a third party for cross-context behavioral advertising.

In the past 12 months, we have not sold or shared any personal information we collect to third parties, and we have disclosed 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 request that we correct your personal information if it is inaccurate;
- The right to limit the usage and sharing of your sensitive personal information to what is necessary to provide the goods and services described above;
- The right to opt out of our sale(s) (if any) and sharing 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 [212-681-9797];

or

email ohall@bccny.com.

We may need to request additional information from you to verify your identity or understand the scope of your request. In verifying requests, we will require you to provide, at a minimum the address and phone number on file. If we are unable to verify your identity, we will need to deny your request.

You may designate an authorized agent to make a CCPA request on your behalf. In such case, we will ask the agent to provide proof that you have given the agent signed permission to act on your behalf. In addition, we will ask you to either (1) verify your identity directly with us in the manner described above or (2) directly confirm with us that you have provided the agent permission to make the request on your behalf.