



North Capital's Commitment to Privacy (including a Supplemental Privacy Notice for California Residents (*see below*))

North Capital has updated its privacy policy effective 3/31/2020

Introduction

This privacy policy (this "**Policy**") explains how North Capital collects, uses and manages your personal information. For purposes of this Policy, references to "**North Capital**", "**we**" or "**us**" means North Capital Investment Technology, Inc., collectively with its subsidiaries, including North Capital Private Securities Corporation and North Capital Inc. (d/b/a Evisor). Independent custodians, brokers, transfer agents, escrow agents, portals and other third parties generally maintain their own privacy policies, which are not covered by this Policy except as described below. If you have any questions regarding this Policy, please contact North Capital (see *Contact Information* below). By establishing a relationship with North Capital or by accessing North Capital's websites, you give your consent to the collection and use of certain personal information as explained in this Policy. Any dispute regarding this Policy is subject to the terms set forth herein, North Capital's website Terms of Use, and the terms of any other written agreement between you and North Capital, including arbitration of disputes and limitation of damages.

This Policy describes the types of information North Capital may collect from you or that you may provide when you visit <https://www.northcapital.com>, <https://www.evisor.com>, <https://www.accredited.am>, <https://www.ppex.com>, <https://www.p3loans.com> and North Capital's other websites accessible from time to time (collectively, "**North Capital's websites**" or "**websites**") and North Capital practices for collecting, using, maintaining, protecting and disclosing that information.

This Policy applies to information North Capital collects:

- on North Capital's websites accessed either directly or through third party directed access;
- in email, text and other electronic messages;
- through mobile and desktop applications you download from a North Capital website, which provide dedicated non-browser-based interaction between you and a North Capital website; and
- when you interact with North Capital's advertising and applications on third-party websites and services.

Please read this Policy carefully to understand North Capital's policies and practices regarding your information and how North Capital will treat it. If you do not agree with North Capital's policies and practices, your choice is not to use North Capital's websites. By accessing or using North Capital's websites, you agree to this Policy. This Policy may change from time to time (*see Changes to North Capital Privacy Policy* below). Your continued use of a North Capital website after North Capital makes changes to this Policy is deemed to be acceptance of those changes, so please check this Policy periodically for updates.

North Capital is not responsible for the privacy policies or the content of websites that link to or are linked to North Capital's websites. Furthermore, some of North Capital's web pages utilize framing techniques to serve content to/from North Capital's partners while preserving the look and feel of North Capital's websites. North Capital has no control of the use or protection of any information provided by you or collected by those websites. Please be aware that you are providing your personal information to these third parties and you should familiarize yourself with the privacy policy of that third party.

Children Under the Age of 16

North Capital's websites are not intended for children under 16 years of age. No one under age 16 may provide any information to or on a website. North Capital does not knowingly collect personal information from children under 16. If you are under 16, do not use or provide any information on a website or on or through any of their features. If North Capital learns that it has collected or received personal information from a child under 16 without verification of parental or legal guardian consent, North Capital will delete that information. If you believe North Capital might have any information from or about a child under 16, please contact North Capital (see *Contact Information* below).

California residents under 16 years of age may have additional rights regarding the collection and sale of their personal information (see *Supplemental Privacy Notice for California Residents* below).

Information North Capital Collects About You and How North Capital Collects It

North Capital collects several types of information from and about users of North Capital websites, including information:

- by which you may be personally identified (“**personal information**”),
 - such as name, postal address, email address, telephone number or any other identifier by which you may be contacted online or offline;
 - such as government-issued identification, employer name and address, social security or employer identification number, age, gender, education, occupation or any other identifier by which North Capital may confirm your identity;
 - such as information to assess your current financial situation (e.g., annual income, sources of income, approximate net worth, approximate value of investment assets, etc.), your financial goals and objectives, your investment experience and other factors, including as related to your suitability for certain investments;
 - payment and account information; and
 - such other personal information as otherwise required to comply with state, federal and local laws, rules, regulations and orders, and in connection with providing services to you or to third parties in or through which you wish to invest;
- that is about you, but individually does not identify you; and
- about your computer and internet connection, the equipment you use to access a North Capital website and usage details.

North Capital collects this information:

- directly from you when you provide it to North Capital;
- automatically as you navigate through North Capital’s websites (such as usage details, Internet Protocol (IP) addresses, browser type, operating system, internet service provider (ISP), pages accessed and prior and following websites that you view and other information that may be collected through cookies, web beacons and other tracking technologies);
- public record sources;
- social media; and
- from third parties, for example, North Capital business partners and service providers.

Information You Provide to North Capital

The information North Capital collects may include:

- information that you provide by completing forms on a North Capital website, including information provided at the time of registering to use a North Capital website, subscribing to a North Capital service, posting material or requesting further services, entering or participating in a contest or promotion sponsored by North Capital or reporting a problem with a North Capital website, product or service;
- records and copies of your correspondence (including email addresses), if you contact North Capital;
- your responses to surveys that North Capital may ask you to complete;
- details of transactions you carry out through or directed by a North Capital website, including payment for and fulfillment of your orders; and
- your search queries on a North Capital website.

You also may provide information to be published or displayed (hereinafter, “**posted**”) on public areas of a North Capital website, or transmitted to other users of a North Capital website or third parties (collectively, “**User Contributions**”). Your User Contributions are posted on and transmitted to others at your own risk. Although North Capital may limit access to certain pages, please be aware that no security measures are perfect or impenetrable. Additionally, North Capital cannot control the actions of other users of a website with whom you may choose to

share your User Contributions. Therefore, North Capital cannot and does not guarantee that your User Contributions will not be viewed by unauthorized persons.

Information North Capital Collects Through Automatic Data Collection Technologies

As you navigate through and interact with a North Capital website, North Capital may use automatic data collection technologies to collect certain information about your equipment, browsing actions and patterns, including:

- details of your visits to a North Capital website, including traffic data, location data, logs and other communication data and the resources that you access and use on a North Capital website; and
- information about your computer and internet connection, including your Internet Protocol (IP) address, operating system and browser type.

North Capital also may use these technologies to collect information about your online activities over time and across third-party websites or other online services (i.e., behavioral tracking). Contact North Capital (see *Contact Information* below) for information on how you can opt out of behavioral tracking on North Capital websites and how North Capital responds to web browser signals and other mechanisms that enable consumers to exercise choice about behavioral tracking.

The information North Capital collects automatically includes personal information, or North Capital may maintain it or associate it with personal information North Capital collects in other ways or receives from third parties. It helps us to improve North Capital websites and to deliver better, more personalized services, including by enabling us to:

- estimate North Capital audience size and usage patterns;
- store information about your preferences allowing us to customize North Capital websites according to your individual interests;
- speed up your searches; and
- recognize you when you return to a North Capital website.

The technologies North Capital uses for this automatic data collection may include:

- **Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of a North Capital website. Unless you have adjusted your browser setting so that it will refuse cookies, North Capital's system will issue cookies when you direct your browser to a North Capital website.
- **Flash Cookies.** Certain features of North Capital websites may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from and on a North Capital website. Flash cookies are not managed by the same browser settings as are used for browser cookies. For information about managing your privacy and security settings for Flash cookies, see *Choices About How North Capital Use and Disclose Your Information* below.
- **Web Beacons.** Pages of North Capital websites and North Capital emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags and single-pixel gifs) that permit North Capital, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).
- **Tags (metadata).** A tag is a keyword or term assigned to a piece of information such as an Internet bookmark, digital image, database record or computer file. This kind of metadata helps describe an item and allows it to be found again by browsing or searching.
- **Scripts.** A data collection or tracking script tracks user interaction on North Capital's websites.
- **Social Media Features and Widgets.** North Capital's websites may include social media features and widgets, such as chat widgets and the Twitter and LinkedIn interactive mini-programs that run on North Capital's websites. These features may collect your Internet Protocol (IP) address, which page you are visiting on North Capital websites, and may set a cookie to enable the feature to function properly. Social media features and widgets are either hosted by a third party or hosted directly on North Capital websites. The privacy statement of the company providing it governs your interactions with these features.

North Capital may receive reports based on the use of these technologies on an individual or aggregated basis.

From time to time, North Capital may partner with third parties to manage its advertising on other websites. North Capital's third party partners may use technologies to gather information about your activities on North Capital's websites and other websites in order to provide you with advertising based upon your browsing activities and interests. If you wish to not have this information used for the purpose of serving you interest-based ads, you may opt-out by contacting North Capital (see *Contact Information* below). Please note this does not opt you out of being served ads. You will continue to receive generic ads.

How North Capital Uses Your Information

North Capital uses information that North Capital collects about you or that you provide to us, including any personal information:

- to present North Capital websites and its contents to you;
- to provide you with information, products or services that you request from North Capital;
- to help expand the scope and improve the quality of services North Capital offers to you now or in the future;
- to provide services to you or on your behalf in connection with investments in or through third parties;
- to fulfill any other purpose for which you provide it;
- to provide you with notices about your account, including expiration and renewal notices;
- to carry out North Capital's obligations and enforce North Capital's rights arising from any contracts entered into between you and North Capital, including for billing and collection;
- to notify you about changes to North Capital websites or any products or services North Capital offers or provides;
- to allow you to participate in interactive features on a North Capital website;
- in any other way described to you when you provide the information;
- to develop additional capabilities and services;
- to comply with state, federal and local laws, rules, regulations and orders; and
- for any other purpose with your consent.

If you subscribe to North Capital's newsletters or marketing emails or submit a contact form to us, North Capital may use your name and email address to send materials to you. In some instances, you may be automatically subscribed to receive certain materials upon creating an account or otherwise logging in.

North Capital may also use your information to contact you about products and services that may be of interest to you. If you do not want North Capital to use your information in this way, please check the relevant box located on the form on which North Capital collect your data (if applicable, the registration form) or contact North Capital (see *Contact Information* below). For more information, see *Choices About How North Capital Use and Disclose Your Information*.

North Capital will retain your information as necessary to comply with state, federal and local laws, rules, regulations and orders, resolve disputes and enforce agreements.

Disclosure of Your Information

North Capital may disclose aggregated information about North Capital users, and information that does not identify any individual, without restriction.

North Capital may disclose personal information that North Capital collect or you provide as described in this Policy:

- to North Capital subsidiaries and affiliates;
- to contractors, service providers and other third parties North Capital uses to support North Capital's business;
- to an investor, a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of North Capital's assets, whether as a

going concern or as part of bankruptcy, liquidation or similar proceeding, in which personal information held by North Capital about North Capital website users is among the assets transferred;

- to fulfill the purpose for which you provide it, e.g., if you give us an email address to use the “email a friend” feature of a North Capital website, North Capital will transmit the contents of that email and your email address to the recipients;
- to governmental and regulatory authorities;
- for any other purpose disclosed by North Capital when you provide the information; and
- with your consent.

North Capital may share your personal information with affiliates, partners and third party service providers if the information is required to provide a service you have requested or to provide you the opportunity to participate in the products or services being offered. The use of your personal information is limited to the purposes identified in North Capital’s agreement with the affiliate, partner or third party service provider, although you may be asked to agree to additional terms including acknowledging additional privacy terms, as a condition of accepting the provision of services. An affiliate is a company that North Capital owns or controls or is under common control. A partner or third party service provider is a firm contracted by North Capital to support certain functions of the business, such as transaction posting, information dissemination, internet marketing, account processing, research, due diligence, reporting, information technology support, transfer agency, escrow, or custodial services. Use of any shared information is limited to the provision of the contracted service, and all partners and third party service providers with whom personal information is shared are required to protect such information in a manner similar to the way we protect such information, including restricting its dissemination except as necessary to provide the contracted service. Within our technology platform, transfers to subsequent third parties are covered by the service agreements with our technology clients.

North Capital may also disclose your personal information:

- to comply with any court order, law or legal process, including to respond to any government or regulatory request;
- to enforce or apply North Capital’s technologies and agreements, including for billing and collection purposes; and
- if North Capital believes disclosure is necessary or appropriate to protect the rights, property or safety of North Capital, North Capital customers or others, which includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

Choices About How North Capital Uses and Discloses Your Information

North Capital strives to provide you with choices regarding the personal information you provide to us. North Capital has created mechanisms to provide you with the following control over your information:

- **Tracking Technologies and Advertising.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe’s website (<https://helpx.adobe.com>). If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly.
- **Promotional Offers from the Company.** If you do not wish to have your contact information used to promote North Capital’s own or third parties’ products or services, you can opt out by checking the relevant box located on the form on which North Capital collects your data (if applicable, the registration form) or at any other time by sending us an email stating your request (see *Contact Information* below). If North Capital has sent you a promotional email, you may send us a return email asking to be omitted from future email distributions.

North Capital does not control third parties’ collection or use of your information to serve interest-based advertising. However these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt out of receiving targeted ads from members of the Network Advertising Initiative (“NAI”) on the NAI’s website (<https://optout.networkadvertising.org>).

Accessing and Correcting Your Information

You can review and change your personal information by logging into the relevant North Capital website and visiting your account profile page or by contacting North Capital (see *Contact Information* below).

If you delete your User Contributions from a North Capital website, copies of your User Contributions may remain viewable in cached and archived pages, or might have been copied or stored by other website users. Proper access and use of information provided on a North Capital website, including User Contributions, is governed by North Capital.

Personal identifying information may be reviewed, changed or corrected at any time. Your personal information cannot be deleted due to our legal and regulatory compliance obligations. However, if you request that we no longer use your personal information, it will be maintained for regulatory archival purposes. You are responsible for maintaining the accuracy and completeness of your personal information. Please review your personal information at regular intervals to ensure that it is accurate and complete. If you would like to review your personal information, or request deletion of your personal information, or if you believe that any of the information you have provided may be incorrect or out of date, or if you have any other questions or concerns regarding your personal information or regarding this Policy, please contact North Capital (see *Contact Information* below).

North Capital may not have any direct relationship with the individuals whose personal information it processes in connection with the use of its technology products or certain other services North Capital provides. In such an instance, an individual who seeks access, or who seeks to correct, amend or delete personal information should direct such individual's query to North Capital's client (the data controller). If requested to remove personal information, we will respond within a reasonable timeframe (subject to North Capital's legal and regulatory compliance obligations).

If you choose to use our referral service to tell a contact about a blog post, we will ask you for your contact's name and email address. We will automatically send your contact a one-time email inviting him or her to visit the blog. North Capital stores this information for the sole purpose of sending this one-time email and tracking the success of our referral program. Your contact may contact us (see *Contact Information* below) to request that we remove this information from our database.

You may choose to stop receiving our newsletter or marketing emails by following the unsubscribe instructions included in these emails, accessing the email preferences in your account settings page, or you can contact us (see *Contact Information* below). Please note that even if you opt-out or unsubscribe from receiving newsletters or marketing emails from us, we may still send you administrative messages as North Capital believes is necessary or advisable in its discretion.

Data Security

North Capital has implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration and disclosure. North Capital utilizes a broad array of security software, systems and operational procedures to ensure the confidentiality and safety of your personal information. While no security system is flawless, North Capital periodically reviews and upgrades the security technology and procedures that safeguard your confidential information. All information you provide to us is stored on North Capital secure servers behind firewalls. Any payment transactions will be encrypted.

The safety and security of your information also depends on you. Where North Capital has given you (or where you have chosen) a password for access to certain parts of a North Capital website, you are responsible for keeping this password confidential. North Capital asks you not to share your password with anyone. North Capital urges you to be careful about giving out information in public areas of any website like message boards. The information you share in public areas may be viewed by any user of the website. You also may be offered online access to information related to your account through a third party service provider, such as an investment portal, advisor, custodian, transfer agent or escrow agent. In such case you are responsible for safeguarding the credentials provided by such third party.

Unfortunately, the transmission of information via the internet is not completely secure. Although North Capital does its best to protect your personal information, North Capital cannot guarantee the security of your personal information transmitted through a North Capital website. Any transmission of personal information is at your own risk. North Capital is not responsible for circumvention of any privacy settings or security measures contained on any North Capital website.

Changes to North Capital Privacy Policy

In the event that North Capital makes changes to its privacy policy, the revised privacy policy will be posted to its websites. If North Capital makes material changes to how North Capital treats North Capital users' personal information, North Capital will notify you through a notice on each website home page. The date this Policy was last revised is identified at the top of the page. You are responsible for ensuring North Capital has an up-to-date active and deliverable email address for you, and for periodically visiting North Capital websites and this Policy to check for any changes. You should review this Policy at regular intervals to remain informed of any changes. You agree that the act of posting a revised privacy policy electronically on our websites satisfies any obligation of North Capital to physically deliver the privacy policy to you.

Contact Information

If you have any questions or comments about this Policy, the ways in which North Capital collects, uses and manages your personal information as described in this Policy, your choices and rights regarding such use, or to register a complaint or concern, please do not hesitate to contact us at:

North Capital
623 E. Fort Union Boulevard, Suite 101
Midvale, Utah 84047
Telephone Number: 1.888.625.7768
Email: info@northcapital.com

Contact Form: <https://www.northcapital.com/contact/>

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North Capital’s Supplemental Privacy Notice for California Residents

Last Reviewed on March 31, 2020

This Privacy Notice for California Residents (this “**Notice**”) supplements the information contained in North Capital’s privacy policy and applies solely to all visitors, users and others who reside in the State of California (“**consumers**” or “**you**”). North Capital adopts this Notice to comply with the California Consumer Privacy Act of 2018 (“**CCPA**”) and any terms defined in the CCPA have the same meaning when used in this Notice.

For purposes of this Notice, references to “**North Capital**”, “**we**” or “**us**” means North Capital Investment Technology, Inc., collectively with its subsidiaries, including North Capital Private Securities Corporation and North Capital Inc. (d/b/a evisor), and references to “**North Capital’s websites**” or “**websites**” means <https://www.northcapital.com>, <https://www.evisor.com>, <https://www.accredited.am>, <https://www.ppex.com> and North Capital’s other websites accessible from time to time.

Information North Capital Collects

North Capital collects information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household or device (“**personal information**”). For purposes of this Notice, personal information does not include:

- publicly available information from government records;
- deidentified or aggregated consumer information; or
- information excluded from the CCPA’s scope, like personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (“**FCRA**”), the Gramm-Leach-Bliley Act (“**GLBA**”) or California Financial Information Privacy Act (“**FIPA**”), and the Driver’s Privacy Protection Act of 1994.

In particular, North Capital has collected the following categories of personal information from its consumers within the last 12 months:

| <u>Category</u> | <u>Examples</u> | <u>Collected</u> |
|--|---|------------------|
| 1. Identifiers | A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver’s license number, passport number, or other similar identifiers. | YES |
| 2. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)) | A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card 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. Some personal information included in this category may overlap with other categories. | YES |
| 3. Protected classification characteristics under California or federal law | Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran | YES |

| <u>Category</u> | <u>Examples</u> | <u>Collected</u> |
|---|---|------------------|
| | or military status, genetic information (including familial genetic information). | |
| 4. Commercial information | Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies. | YES |
| 5. Biometric information | Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints and voiceprints, iris or retina scans, keystroke, gait or other physical patterns, and sleep, health, or exercise data. | NO |
| 6. Internet or other similar network activity | Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement. | YES |
| 7. Geolocation data | Physical location or movements. | NO |
| 8. Sensory data | Audio, electronic, visual, thermal, olfactory or similar information. | NO |
| 9. Professional or employment-related information | Current or past job history or performance evaluations. | YES |
| 10. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)) | Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records. | YES |
| 11. Inferences drawn from other personal information | Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes. | YES |

North Capital obtains the categories of personal information listed above from the following categories of sources:

- directly from you when you provide it to North Capital;
- automatically as you navigate through North Capital's websites (such as usage details, Internet Protocol (IP) addresses, browser type, operating system, internet service provider (ISP), pages accessed and prior and following websites that you view and other information that may be collected through cookies, web beacons and other tracking technologies); and
- from third parties, for example, North Capital business partners.

Use of Personal Information

North Capital may use or disclose the personal information North Capital collects for one or more of the following purposes:

- to fulfill or meet the reason you provided the information, e.g., (i) if you share your name and contact information to request a price quote or ask a question about our products or services, North Capital will use that personal information to respond to your inquiry and (ii) if you provide your personal information

to purchase a product or service, North Capital will use that information to process your payment and facilitate delivery and may also save your information to facilitate new product orders or process returns;

- to provide, support, personalize and develop North Capital's websites, products and services;
- to provide services to you or on your behalf in connection with investments in or through third parties;
- to create, maintain, customize and secure your account with North Capital;
- to process your requests, purchases, transactions and payments and prevent transactional fraud;
- to provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve North Capital's responses;
- to personalize your website experience and to deliver content and product and service offerings relevant to your interests, including targeted offers and ads through North Capital's websites, third-party sites and via email or text message (with your consent, where required by law);
- to help maintain the safety, security and integrity of North Capital's websites, products and services, databases and other technology assets and business;
- for testing, research, analysis and product development, including to develop and improve North Capital's websites, products and services;
- to respond to law enforcement requests and as required by applicable law, court order or governmental regulations or regulatory rules;
- to comply with laws and regulations and to comply with other legal process and law enforcement requirements, including any internal policy based on or reflecting legal or regulatory guidance, codes or opinions;
- as described to you when collecting your personal information or as otherwise set forth in the CCPA; and
- to evaluate or conduct an investment or a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of North Capital's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by North Capital about North Capital clients or website users is among the assets transferred.

North Capital will not collect additional categories of personal information or use the personal information North Capital collected for materially different, unrelated, or incompatible purposes without providing you notice.

Sharing Personal Information

North Capital may disclose your personal information to a third party for a business purpose. When North Capital discloses personal information for a business purpose, North Capital enters a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

North Capital may share your personal information with the following categories of third parties:

- North Capital subsidiaries and affiliates;
- to contractors, service providers and other third parties;
- data aggregators; and
- potential investors and buyers and other successors in the event of a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of North Capital's assets; and
- governmental and regulatory authorities.

Disclosures of Personal Information for a Business Purpose

In the preceding 12 months, North Capital has disclosed the following categories of personal information for a business purpose:

- Category A: Identifiers;
- Category B: California Customer Records personal information categories;
- Category C: Protected classification characteristics under California or federal law;
- Category D: Commercial information;
- Category F: Internet or other similar network activity;
- Category I: Professional or employment-related information;

- Category J: Non-public education information; and
- Category K: Inferences drawn from other personal information.

Sales of Personal Information

In the preceding 12 months, North Capital has not sold personal information.

Your Rights and Choices

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

Some of the key rights provided to California consumers by the CCPA are:

- the *right to know* what personal information is collected, used, share or sold, both as to the categories and specific pieces of personal information;
- the *right to delete* personal information held by businesses and by extension, a business’s service provider; and
- the *right to opt-out* of the sale of their personal information (Note that North Capital does not sell the information of its customers).

Access to Specific Information and Data Portability Rights

You have the right to request that North Capital disclose certain information to you about North Capital’s collection and use of your personal information over the past 12 months. Once North Capital receives and confirms your verifiable consumer request (see *Exercising Access, Data Portability and Deletion Rights* below), North Capital will disclose to you:

- the categories of personal information North Capital collected about you;
- the categories of sources for the personal information North Capital collected about you;
- North Capital’s business or commercial purpose for collecting or selling that personal information;
- the categories of third parties with whom North Capital share that personal information;
- the specific pieces of personal information North Capital collected about you (also called a data portability request); and
- if North Capital disclosed your personal information for a business purpose, a list disclosing disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

North Capital does not provide these access and data portability rights for B2B personal information.

Deletion Request Rights

You have the right to request that North Capital delete any of your personal information that North Capital collected from you and retained, subject to certain exceptions. Once North Capital receive and confirm your verifiable consumer request (see *Exercising Access, Data Portability and Deletion Rights* below), North Capital will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

North Capital may deny your deletion request if retaining the information is necessary for North Capital or the third parties to which such information is disclosed to:

1. complete the transaction for which North Capital collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, or otherwise perform our contract with you;
2. detect security incidents, protect against malicious, deceptive, fraudulent or illegal activity, or prosecute those responsible for such activities;
3. debug products to identify and repair errors that impair existing intended functionality;
4. exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law;

5. comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *et. seq.*);
6. engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent;
7. enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with North Capital;
8. comply with a legal or regulatory obligation; or
9. make other internal and lawful uses of that information that are compatible with the context in which you provided it.

North Capital does not provide these access and data portability rights for B2B personal information.

Exercising Access, Data Portability and Deletion Rights

To exercise the access, data portability and deletion rights described above, please submit a verifiable consumer request to North Capital by either:

- calling North Capital at 888.625.7768;
- emailing North Capital at info@northcapital.com;
- completing and submitting a North Capital Contact Form at <https://www.northcapital.com/contact/>; or
- mailing North Capital at 623 E. Fort Union Boulevard, Suite 101, Midvale, Utah 84047.

Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- provide sufficient information that allows North Capital to reasonably verify you are the person about whom North Capital collected personal information or an authorized representative; and
- describe your request with sufficient detail that allows North Capital to properly understand, evaluate; and respond to it.

North Capital cannot respond to your request or provide you with personal information if North Capital cannot verify your identity or authority to make the request and confirm the personal information relates to you.

Making a verifiable consumer request does not require you to create an account with North Capital. However, North Capital does consider requests made through your password protected account sufficiently verified when the request relates to personal information associated with that specific account.

North Capital will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Response Timing and Format

North Capital endeavors to respond to a verifiable consumer request within 45 days of its receipt. If North Capital requires more time (up to 90 days), North Capital will inform you of the reason and extension period in writing.

If you have an account with North Capital, North Capital will deliver its written response to that account. If you do not have an account with North Capital, North Capital will deliver its written response by mail or electronically, at your option.

Any disclosures North Capital provides will only cover the 12-month period preceding the verifiable consumer request's receipt. The response North Capital provides will also explain the reasons North Capital cannot comply with a request, if applicable. For data portability requests, North Capital will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

North Capital does not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive or manifestly unfounded. If North Capital determines that the request warrants a fee, North Capital will tell you why North Capital made that decision and provide you with a cost estimate before completing your request.

Non-Discrimination

North Capital will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, North Capital will not:

- deny you goods or services;
- charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties;
- provide you a different level or quality of goods or services; or
- suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

However, North Capital may offer you certain financial incentives permitted by the CCPA that **can result** in different prices, rates or quality levels. Any CCPA-permitted financial incentive North Capital offer will reasonably relate to your personal information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt in consent, which you may revoke at any time.

Authorized Agents

You can designate an authorized agent to make a data-rights request under the CCPA on your behalf. An authorized agent is a person or a business entity registered with the California Secretary of State that a consumer has authorized to act on their behalf. If you are an authorized agent and submit a data-rights request on behalf of a consumer, North Capital may require that the consumer provide you with written authorization to make the request on their behalf and verify their own identity directly with North Capital.

CCPA Data Rights Are Not Available for Certain Personal Information

CCPA data rights are not available for personal information we collect about you in the course of you acting as a job applicant to or an employee, owner, director, officer or contractor of North Capital, including, in these contexts, your emergency contact information and personal information that is necessary for us to retain to administer benefits for another person relating to you acting as a job applicant to or an employee, owner, director, officer or contractor of North Capital. Any personal information North Capital collects and uses will only be used within the context of your role or former role in these capacities.

Changes to Our Privacy Notice

North Capital reserves the right to amend this Notice at its discretion and at any time. When North Capital makes changes to this Notice, North Capital will post the updated notice on North Capital's websites and update the notice's effective date. **Your continued use of North Capital's websites following the posting of changes constitutes your acceptance of such changes.**

Contact Information

If you have any questions or comments about this Notice, the ways in which North Capital collects, uses and manages your information as described in this Notice and in the Policy, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact North Capital at:

North Capital
623 E. Fort Union Boulevard, Suite 101
Midvale, Utah 84047
Telephone Number: 1.888.625.7768
Email: info@northcapital.com

Contact Form: <https://www.northcapital.com/contact/>

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