



Privacy Policy

Red Oak Compliance, and its affiliates (together, the “Company”, “us” or “we”, “Red Oak”), adopted this policy with recognition that protecting the privacy and security of the nonpublic personal information we obtain about our clients is an important responsibility. We also know that you expect us to service you in an accurate and efficient manner. To do so, we must collect and maintain certain nonpublic personal information about you. We want you to know what information we collect and how we use and safeguard that information.

WHAT INFORMATION WE COLLECT

We collect certain nonpublic personal information about you (such as your name, address, social security number, etc.) that you provide on applications or other forms as well as communications (electronic, telephone, written or in person) with you or your authorized representatives (such as your attorney, accountant, etc.). We also collect information about your brokerage accounts and transactions (such as purchases, sales, account balances, inquiries, etc.).

WHAT INFORMATION WE DISCLOSE

Red Oak does not disclose the nonpublic personal information we collect about our clients to anyone except:

(1) in furtherance of our business relationship with clients, and then only to those persons necessary to effect the transactions and provide the services that clients authorize (such as broker-dealers, custodians, independent managers etc.); (2) to persons assessing our compliance with industry standards (e.g., professional licensing authorities, etc.); (3) our attorneys, accountants, and auditors; or (4) as otherwise provided by law.

We are permitted by law to disclose the nonpublic personal information about you to governmental agencies and other third parties in certain circumstances (such as third parties that perform administrative services on our behalf). These third parties are prohibited from using or sharing the information for any other purpose. If you decide to either terminate our services or become an inactive client, we will continue to adhere to our Privacy Policy, as may be amended from time to time.

SECURITY OF YOUR INFORMATION

We restrict access to your nonpublic personal information to those employees who need to know that information to service your account. We maintain physical, electronic and procedural safeguards that comply with applicable federal or state standards to protect your nonpublic personal information.

CHANGES TO OUR PRIVACY POLICY OR RELATIONSHIP WITH YOU

Our policy about obtaining and disclosing information may change from time to time. We will provide you notice of any material change to this policy before we implement the change.



OPTING OUT

Clients can opt out of allowing Red Oak to share their nonpublic personal information with non-affiliated third parties when such information is not necessary to service their accounts. To opt out, please contact us in writing at 17208 Riata Vista Circle B 100, Austin, TX 78727, or by telephone at (888) 302-4594. Opt-out requests should indicate your name, account number, and the specific information you wish to restrict from sharing. We will process your request within a reasonable time, not to exceed thirty (30) days.

REQUESTS FOR INFORMATION

For a copy of our Privacy Policy, please contact us either in writing at 17208 Riata Vista Circle B 100 Austin, TX 78727, or by phone at (888) 302-4594.

Red Oak California Consumer Privacy

Red Oak Compliance, and its affiliates (together, the “Company”, “us” or “we”), consider your privacy our utmost concern. This privacy notice (the “Notice”) contains information about how the Company collects, uses, and shares Personal Information, as defined by the California Consumer Privacy Act (“CCPA”).

1. Purpose and content

1.1 This Notice applies to all websites operated by us, as indicated on the relevant website ("Sites"). This Notice is for California residents only pursuant to the CCPA.

1.2 The CCPA defines Personal Information broadly to mean information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household.

1.3 Please note that much of the Personal Information we collect about California residents is not covered by this Notice. The CCPA includes certain exemptions that may apply to our use or collection of your Personal Information and it is possible that not all Personal Information that we collect from you or about you is covered by the CCPA or this CCPA Privacy Notice. For example:

- Personal Information that is collected, processed or sold pursuant to the federal Gramm-Leach-Bliley Act (“GLBA”) and implementing regulations is not covered by this Notice. If you seek to or have obtained a financial product or service from us, please read Red Oak’s Privacy Notice, which explains the types of nonpublic personal information we collect from you and how we share it, consistent with federal privacy laws applicable to financial institutions, including the GLBA. This CCPA Privacy Notice and the rights granted hereunder do not apply to the information we collect from or about you pursuant to Red Oak’s Privacy Notice; and



- Personal information that we collect about you in a business-to-business context, including when you are communicating with us as an employee of a business to whom we are providing a product or service, or receiving a product or service from, is not covered by this Notice.

2. Categories of Personal Information that we may collect, use, and share

2.1 We may collect, use, or share Personal Information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you or a member of your household. The categories of Personal Information we may collect, use, or share include, but are not limited to:

- Identifiers (e.g., name, alias, postal address, unique personal identifier, online identifier, IP address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers);
- Categories of Personal Information in California Civil Code Section 1798.80
- Commercial information (e.g., records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies);
- Internet or other electronic network activity information (e.g., browsing history, search history, and information regarding a consumer's interaction with an internet website, application or advertisement);
- Geolocation data;
- Professional or employment-related information (e.g., job application or resume information, past and current job history, and job performance information);
- Inferences drawn from Personal Information (e.g., consumer profiles reflecting a consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes).

3. Sources from which we may collect your Personal Information

3.1 We may obtain your Personal Information:

- Directly from you when you contact us via the internet, in person, or subscribe to a company mailing list;
- From third parties such as data aggregators, social media, or companies with which we have business relationships;
- Using online tracking technologies (including cookies, email tracking, and similar technologies), which may be used, among other things, to provide you with advertisements tailored to your interests (also known as targeted or behavioral advertising);

4. How we use your Personal Information

4.1 We use your Personal Information for our business and commercial purposes, including:



- To present our Sites and their contents to you;
- To deliver the information, products or services you requested from us;
- To reach out to you about and market our products and services to you;
- To communicate with you;
- To help us improve our Sites and deliver a more personalized experience;
- To deliver interest-based, targeted or behavioral advertising to you;
- To carry out our obligations and enforce our rights;
- In any other way we describe when you provide the information, or otherwise at your direction or with your consent;
- As permitted by law or as we may notify you.

5. How we share your Personal Information

5.1 We do not currently sell your Personal Information. The CCPA defines the term “sale” very broadly. In the past twelve months, we have disclosed the following categories of Personal Information to third parties that provide services to us, such as website advertising and analytics services. Such disclosures may be considered a sale for purposes of the CCPA:

- Identifiers;
- Categories of personal information described in Cal. Civ. Code 1798.80(e);
- Internet or other electronic network activity information;
- Geolocation data;
- Inferences drawn from Personal Information.

5.2 We share your Personal Information for business purposes and in the last twelve months we have shared the categories of Personal Information listed in Section 2 for a business purpose. For example, we share Personal Information with our affiliates, with entities that provide marketing services to us, and with our business partners, service providers and vendors. We may share your Personal Information with third parties and endeavor to ensure that they use it only for those services requested and keep it confidential.

5.3 We may share any of the Personal Information described in this CCPA Notice with third parties as part of or in connection with a sale, merger, consolidation, change of control, transfer of assets or reorganization of all or part of our business.

5.4 We may additionally share Personal Information in connection with litigation, investigations, regulatory or governmental enquiries or for other legal or regulatory purposes involving the Company or the clients of the Company, or as otherwise required by law.

6. Your rights under the CCPA

6.1 As a California resident, you have the right to know how we have collected, used, and shared your Personal Information in the last twelve months. Specifically, you have the right to request to know:



- The categories and specific pieces of your Personal Information we have collected about you in the twelve months prior to your request, the categories of sources from which we have collected it, the business or commercial purpose for its collection or sale and the categories of third parties with whom we have shared it;
- The categories of your Personal Information we share for a business purpose, the categories of the third parties with whom it is shared, and the purpose for sharing this information; and
- The categories of your Personal Information sold and the categories of third parties to whom it was sold.

6.2 In addition, you have the right to request that we delete your Personal Information.

6.3 You have a right to not be discriminated against for exercising these rights. In addition, as amended by the California Privacy Rights Act (“CPRA”) effective January 1, 2023, you also have: (a) the right to opt-out of the sale or sharing of your Personal Information (Cal. Civ. Code § 1798.120); (b) the right to correct inaccurate Personal Information we hold about you; and (c) the right to limit our use and disclosure of Sensitive Personal Information (as defined by the CPRA). To exercise your right to opt-out of the sale or sharing of your Personal Information, please visit our website or contact us using the information in Section 7.3.

7. Requests to know or delete your Personal Information

7.1 You have the right to request that we disclose to you the categories and/or specific pieces of Personal Information that we have collected about you. When you make a request, we will first take steps to verify your identity. Once we have verified your identity, we will provide information from our records for the preceding twelve months. Please note, we may decline your request if we are unable to verify your identity.

7.2 You have the right to request that we delete your Personal Information. When you make a request, we will first take steps to verify your identity. Once we have verified your identity, we will delete your Personal Information from our records unless an exception to your deletion request applies or we are unable to verify your identity. We may deny your request to delete Personal Information in whole or in part if retaining the information is necessary for us or our service providers to:

- Complete a transaction for which the Personal Information was collected, provide a good or service requested by you, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract(s) with you;
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities;
- Debug products to identify and repair errors that impair existing intended functionality;
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law;
- Comply with the California Electronic Communications Privacy Act;
- 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;

- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us;
- Comply with a legal obligation; or
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

7.3 To submit a request to know or a request to delete as described above, please call 888.302.4594 or complete contact info at <https://www.redoakcompliance.com/contact/request-more-information/>

7.4 To review and update the cookies collected, please review the following:

Our use of Cookies

We use cookies to enhance site navigation, analyze site usage, and assist in our marketing efforts. Unless you change your browser settings to block cookies, you are agreeing to their use.

Strictly Necessary Cookies

Always Active

These cookies are required to make our website usable by enabling basic functions. Our website cannot function properly without these cookies.

Marketing Cookies

These cookies track your visit across the website. We use this information to provide you, and others like you, with targeted advertising and content we think will be of interest.

Statistical Cookies

These cookies help us to understand how visitors interact with our website by collecting and reporting information anonymously. This helps us improve the designs of our website.

Preference Cookies

These cookies enable our website to remember information that changes the way the website behaves or looks, like personalizing your content, preferred language or location.

8. Verifying and responding to your requests

8.1 We only respond to requests that you make which are “verifiable.” To verify your requests, we may require authentication of you or the authorized agent acting on your behalf that is



reasonable in light of the nature of the personal information requested. We may need additional information from you to verify your request.

8.2 In order to verify your request, we may need to obtain additional information about you to match the information we already have about you. If you provide us with new personal information that we did not already have about you, we will use it solely for the purposes of verifying your request. We will let you know if we need more information from you to verify your request. Please reply to our requests promptly.

8.3 If we cannot verify your request, we will let you know.

9. Changes to this notice

We will occasionally update this Notice to reflect new legislation or industry practice and Company changes. We encourage you to review this Notice periodically to be informed of how we collect, use and share your Personal Information.



Red Oak EU / UK Privacy Notice

Red Oak Compliance, and its affiliates (together, the “Company”, “us” or “we”) consider your privacy our utmost concern.

This privacy notice (the “Notice”) outlines the information we may collect about you and describes the basis on which we process your Personal Information, as defined by the European Union’s (“EU”) General Data Protection Regulation (“GDPR”) and other United Kingdom (“UK”) and European data privacy laws (the “Privacy Laws”). This Notice also gives information regarding the basis on which we process your Personal Information and your privacy rights under applicable Privacy Laws.

This Notice applies to all websites operated by us, as indicated on the relevant website (“Sites”). This Notice is addressed to any natural person who is resident in the European Union and/or the UK who is any of the following: an investor or prospective investor in any fund or account managed or advised by the Company, a member, distributor, sales representative, business affiliate, or other representative of any client or prospective client of the Company, a Site user, a business contact working with service providers and vendors, or an individual on a Company mailing list (“you”) whose Personal Information the Company collects, controls and processes in the conduct of its business.

1. Collection of Personal Information

Our primary goal in collecting Personal Information from you is to effectively conduct business with our business partners and when applicable provide services and features to our clients, investors and potential clients and investors. You may make a data request by contacting us at <https://www.redoakcompliance.com/contact/request-more-information/>

2. Types of Personal Information held and its use

2.1 Customer services and administration

The Company may, in the conduct of our business, obtain Personal Information about you that may include, subject to the type of business or service relationship we have with you, without limitation:

- Contact information (*e.g.*, your full name, business and/or home mailing address, telephone number, business and/or personal email address, job title);
- Identification information (*e.g.*, date of birth, social security number, tax or other identification numbers and documents);
- Financial Information (*e.g.*, documents and information about your income, account transactions and holdings with us);
- Browsing Information (*e.g.*, Internet Protocol (or IP) address, browser language and type, domain name, operating system, location data, resources that you access).



In the course of our business, we may collect Personal Information about you from sources including, but not limited to:

- Information we receive from you, your application, subscription or other forms or material completed or supplied by an actual or prospective client of the Company or a third party;
- Other written, electronic or verbal correspondence which relate to the business activities by or on behalf of an actual or prospective client of the Company;
- Information we receive from you when subscribing to a Company mailing list;
- Information we receive from security footage recorded for safety and security purposes when visiting Company premises; and
- Information we automatically collect from Company Sites by using cookies and other online tracking technologies.

We process your Personal Information to fulfill our contractual obligations, our statutory obligations and/or the legitimate interests of the Company and for other purposes for which the Company has a lawful basis under the Privacy Laws, including:

- To administer and deliver to you the products and/or services you have requested;
- For purposes of reporting to, or communicating with, actual or prospective clients of the Company or third parties or the appointment or engagement of the Company consistent with our obligations to such Company clients;
- To retain records of our business transactions and communications;
- For compliance with legal and regulatory requirements such as regulations aimed at prevention of money laundering or terrorist financing or other “Know your Client” requirements;
- To verify the status and/or eligibility of an actual or prospective client of the Company for services offered by the Company and for compliance with tax reporting requirements;
- Due diligence or monitoring activities of counter-parties;
- In connection with litigation, investigations, regulatory or governmental enquiries or for other legal or regulatory purposes involving the Company or the clients of the Company;
- To enable us to respond to certain requests by you such as access requests, scheduling of meetings or similar requirements;
- To operate our Sites efficiently and improve our service to you; and
- For other legitimate business interests.

We will endeavor to keep your information accurate and up to date, and not keep it for longer than is necessary. We are required to retain information in accordance with the law, such as information needed for income tax and audit purposes. How long certain kinds of Personal Information should be kept may also be governed by specific business-sector requirements and agreed practices. Personal Information may be held in addition to these periods depending on individual business needs.

2.2 Monitoring use of our Sites



We collect, process, and use Personal Information on our Sites through the use of cookies in order to offer a better, more tailored overall client experience, better adapt our business processes to our clients' needs, and provide access to relevant product information and online applications. Please see Section 3 below for more information on cookies and similar technologies.

2.3 Marketing

The Company collects certain information that you provide to us when subscribing to a Company mailing list, which may include your name, email address and other contact details. Some of your Personal Information collected, in accordance with this Notice, may be used by us and third party service providers to contact you by email, fax, telephone and/or post for sending information or promotional material on our products and/or services and/or those of the Company.

In addition, we may process your Personal Information in order to communicate with you for marketing purposes. In this event, we may provide additional information that we believe may be of interest, including about services, news updates, research or market commentary, conferences, or events offered by or in conjunction with the Company.

We give you the opportunity to opt-out of receiving marketing communications and may in certain circumstances need to obtain your consent before sending such communications to you. Further detail can be found in each marketing communication sent by us.

Email Tracking: So that we can better understand our users' needs, we track responses to our emails - for example, to see which links are the most popular in newsletters, and to log and follow up responses to our marketing messages. To do this, we use small image files that are placed within the body of our email messages. They enable us to tell if a message has been opened and to track click-through's on links within the message.

3. Cookies

We use cookies on our Sites to provide Site visitors with a better user experience when they browse our Sites. It also enables us to improve our Sites. If you use one of our Sites, and through your consent to the pop up that appeared on your first visit to such Site, you agree to the use of cookies in accordance with this Notice.

A cookie is a small text file that we store on the browser or the hard drive of your desktop, tablet or smartphone when you first visit our Sites. The cookie will help our Sites, or another website, recognize your desktop, tablet or smartphone the next time you visit. A cookie can contain Personal Information.

Cookies may be required to operate our Sites, allow us to recognize and count the number of visitors and to see how visitors move around our Sites, which may help us improve the design of our Sites. Cookies may also recognize you when you return to our Sites, enabling us to personalize our content and remember your preferences, and may be used to record your visit to our Sites, the pages you visited and the links you followed. We may use this information to



provide you with targeted advertising and content we think you will be interested in. In some cases we may use information from third party cookies to help us with market research or improving the design of our Sites (for example, where traffic to our Sites comes from).

You can block cookies by activating the setting on your browser that allows you to refuse all, or some, cookies. If you block all cookies you may find that parts of our Sites do not work properly, or you may not be able to access our Sites at all.

4. Third Parties

We may pass your Personal Information on to third-party service providers contracted to us in the course of dealing with you. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil the service that they provide you on our behalf. When they no longer need your data to fulfil this service, they will dispose of the details in line with our procedures.

5. Disclosures

We may share your Personal Information with the Company entities including with the Company Funds for any of the purposes set forth above. In any such business purposes set out above, the Company may share your Personal Information with third parties, including:

- Service providers *e.g.*, attorneys, auditors, accountants, tax advisers, administrators, custodians, depositaries, distribution managers and brokerage firms, event organizers or other agent, adviser or service provider of the Company, a Company Fund and/or the Company client;
- Other counter-parties *e.g.*, managers, general partners or investment advisers or administrators or any of their respective agents or representatives; and
- Regulatory authorities (including tax authorities), courts and bodies as required by law or requested for internal investigations and reporting.

We may transfer, sell or assign any of the information described in this policy to third parties as a result of a sale, merger, consolidation, change of control, transfer of assets or reorganization of our business.

6. Transfers outside the UK / European Economic Area (EEA)

Where your Personal Information is processed by third parties outside the UK / EEA, we will ensure appropriate safeguards are in place to adequately protect it, as required by applicable law. Such safeguards may include, for transfers from the EU: Standard Contractual Clauses (“SCCs”) approved by the European Commission under Article 46 of the GDPR; and for transfers from the UK: an International Data Transfer Agreement (“IDTA”) or the UK Addendum to the EU SCCs as approved by the UK Information Commissioner’s Office. We will provide further information on the specific safeguards applied upon request.

Services on the Internet are accessible globally, so collection and transmission of Personal Information is not always limited to one country. We may transfer your Personal Information, for the purposes listed above, to the Company, service providers or other third parties which may be located in countries outside the EEA, whose laws may not give the level of protection to Personal Information as within the EEA. This may include transfers to Companies in the US (who may collect some data directly from you, in relation to the Sites which it operates) and to third parties who provide us with email and marketing services. Where we conduct any transfers, we will endeavor to take steps reasonably necessary to ensure that your data is treated securely.

7. Confidentiality and security of your Personal Information

We are committed to keeping the data you provide us secure and will take reasonable precautions to protect your Personal Information from loss, misuse or alteration. Once we have received your information, we will use procedures and security features to try to prevent unauthorized access.

We have implemented information security policies, rules and technical measures to protect the Personal Information that we have under our control from:

- Unauthorized access;
- Improper use or disclosure;
- Unauthorized modification; and
- Unlawful destruction or accidental loss.

8. How to access, update and erase your Personal Information

At your request, we can confirm what information we hold about you and how it is processed. If we do hold Personal Information about you, you can request the following information:

- Identity and the contact details of the person or organization that has determined how and why to process your data. The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of us or a third party, information about those interests.
- The categories of Personal Information collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the Personal Information to a third country or international organization, information about how we ensure this is done securely.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of Personal Information is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the Personal Information and the possible consequences of failing to provide such data.
- The source of Personal Information if it wasn't collected directly from you.



- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

Upon request, we will provide you with a readable copy of the Personal Information which we keep about you. We may require proof of your identity.

We will allow you to challenge the data that we hold about you and, where appropriate in accordance with applicable laws and policies, you may request to have your Personal Information:

- Erased;
- Rectified or amended; and/or
- Completed. and/or Ported (i.e., the right to data portability under Article 20 GDPR, where processing is based on consent or a contract and is carried out by automated means, you have the right to receive your Personal Information in a structured, commonly used and machine-readable format and to transmit it to another controller); and/or Object to processing (i.e., the right under Article 21 GDPR to object at any time to processing of your Personal Information where such processing is based on our legitimate interests, including profiling based on those interests).

If you would like to make a data request, please contact [us](mailto:us@redoak.com) at <https://www.redoakcompliance.com/contact/request-more-information/>

Changes to this Notice

We will occasionally update this Notice to reflect new legislation or industry practice, Company changes and customer feedback. We encourage you to review this Notice periodically to be informed of how we are protecting your Personal Information.