

LACM GLOBAL, LTD. PRIVACY POLICY

This Privacy Policy explains how LACM Global, Ltd. (“**LACM Global**”) and its parent company, Los Angeles Capital Management LLC (“**Los Angeles Capital**”) (collectively, “**LACM**”, “**we**”, “**us**” and “**our**”), collect, use, share and otherwise process your Personal Data and other information to provide services or in connection with your use of the LACM Global or Los Angeles Capital websites (collectively, our “**websites**”).

We may provide supplemental privacy notices on specific occasions when we are collecting or processing Personal Data about you so that you are fully aware of how and why we are using your Personal Data. Those supplemental notices should be read together with this Privacy Policy.

Please take the time to read and understand this Privacy Policy.

Personal Data

The term “**Personal Data**” as used in this Privacy Policy means any information relating to you such as your name, contact details, etc. Personal Data does not include data from which you can no longer be identified such as anonymised aggregate data.

For the purposes of relevant data protection law, LACM Global is a data controller of your Personal Data (or, for purposes of California data protection law, a “business”).

Personal data that we collect about you

The kinds of Personal Data we may collect include:

- **Information that you provide to us.** This includes information about you that you provide to us by completing forms online or by communicating with us, whether face-to-face, by phone, e-mail or otherwise. This information may include:
 - your full name, company name, job title, email address, mailing address, telephone and fax numbers, mobile telephone number, and other information you provide to us directly online, such as information collected for identification purposes; and
 - other information that you provide to us in connection with the services we provide.
- **Information we collect or generate about you.** We may collect information about you when you seek information about us or establish a business relationship with us on behalf of yourself or your organization. This information may include:
 - information collected from your organization, such as details about authorised signatories;
 - copies of any relevant trust deeds, partnership agreements, constitutions, articles of association or other corporate entity documents;
 - information that you disclose to us via our websites, including your voluntary disclosure of any personal information into the website, e.g., by submitting an online form; and
 - information we automatically collect when you interact with our website via cookies and other similar technologies, such as technical and navigational information, including what pages you visited, when you entered and left the website, the number of times you visited the website, and what site you came from prior to visiting the website. See our [Cookie Policy](#) for more information.

- **Information from other sources**, such as publicly available sources like your company's website.

We may combine the Personal Data and other information collected on the LACM Global website with information collected from or about you in other contexts. We will treat such combined information in accordance with this Privacy Policy.

Uses of your Personal Data

Your Personal Data may be stored and processed by us in the following ways and for the purposes for which it was provided to us, as required by law, and for our business purposes, including:

- to perform our obligations and exercise our rights under a contract that we have entered into with you or your organization, and to otherwise provide our products, services, and reporting;
- for investments in a commingled fund, to perform our obligations and exercise our rights under a contract that we have entered into with a commingled fund, a third-party management company, fund administrator, fund transfer agent, and fund custodian;
- to communicate with you, notify you about important updates or changes to our products and services, and address relevant inquiries or complaints;
- to meet our legal obligations and protect our legal rights, including, without limitation, to comply with recordkeeping, reporting, audit, and tax obligations under applicable law (such as corporations, tax, sanctions and anti-money laundering);
- for marketing and promotional purposes, consistent with applicable law and subject to any preferences you have communicated to us. For example, we may use your email address to send you news and newsletters, or to otherwise contact you about our services or information we think may be of interest to you;
- in connection with our cybersecurity, incident response and business resiliency programs; and
- to process Personal Data related to your use of our email system in order to enable the effective operation of the email system and ensure that it is used in accordance with our policies and procedures.

The laws in some jurisdictions require companies to tell you about the legal grounds they rely on to process Personal Data. We process your Personal Data as described in this Privacy Policy under the following **legal bases**:

- to perform our obligations and exercise our rights in connection with any contract that we have entered into with you or your employer, and to otherwise provide our products and services to you;
- to comply with our legal and regulatory obligations;
- to establish, exercise or defend our legal rights or for the purpose of legal proceedings;
- the processing is necessary for our legitimate business interests (or the legitimate interests of one or more of our affiliates), such as:
 - allowing us to effectively and efficiently administer and manage the operation of our business; or
 - maintaining compliance with internal policies and procedures;

- your consent to the processing purpose.

Disclosure of your information to third parties

We may disclose your Personal Data to affiliates for the purposes of:

- the management and administration of our business and our affiliates' business; and
- assessing compliance with applicable laws, rules and regulations, and internal policies and procedures across our business and our affiliates' businesses.

We will take steps to ensure that the Personal Data is accessed only by employees of our affiliates that have a need to do so for the purposes described in this policy.

We may also share your Personal Data with third parties outside of our corporate group for the following purposes:

- to third party agents and contractors for the purposes of providing services to us, including administrators, transfer agents, custodians, broker-dealers, management companies technology and communication service providers, law firms, accountants, consultants, auditors, and other professional advisers. These service providers may collect, process, and retain information about you, in accordance with applicable laws, directly on behalf of us. These third parties will be subject to confidentiality requirements and they will only use your Personal Data as described in this Privacy Policy;
- if we sell any of our business or assets, in which case we may disclose your Personal Data to the prospective buyer for due diligence purposes, and if we are acquired by such third party, we may disclose your Personal Data to the third party buyer; and
- to the extent required by law, for example, if we are under a duty to disclose your Personal Data in order to comply with any legal or compliance obligation, or to establish, exercise or defend our legal rights.

Retention of personal data

How long we hold your Personal Data for will vary. The retention period will be determined by the following criteria:

- the purpose for which we are using your Personal Data – we will need to keep the data for as long as is necessary for that purpose; and
- legal obligations – laws, regulation, or internal policy may set a minimum period for which we have to keep your Personal Data.

We will use commercially reasonable physical, electronic, and procedural safeguards to protect your Personal Data from loss, misuse, and unauthorised access, disclosure, alteration, and destruction in accordance with applicable law. Note that despite our best efforts, no data security measures can fully guarantee security all of the time.

Your rights

Depending on your jurisdiction of residence, you may have certain rights to access, delete, or correct your Personal Data. Your rights will be subject to applicable exceptions, and we may need to verify your identity before processing your request. If you would like to submit a request relating to your data, please contact us using the details set out in the "Contacting us" section below.

If you are a resident of the European Economic Area or the United Kingdom, see our [GDPR Privacy Notice](#) for more information about your rights. If you are a resident of the State of California, see our [Notice for California Residents](#) for more information about your rights.

Children's privacy

Our websites and services are not directed to children under the age of 13, and we do not knowingly collect any "personal information" (as defined in the U.S. Children's Online Privacy Protection Act or "COPPA") from children under 13 without the verifiable consent of that child's parent or guardian. If you are aware of a child providing his or her personal information without parental consent, please contact us at privacy@lacapm.com. We will endeavour to delete all data we collected from a child under 13, if we discover we collected it without that child's parental consent.

International Users

Your information is maintained and processed by LACM, its affiliates and our third-party service providers in the United States, and may also be maintained, processed, and stored in other jurisdictions that may have different data protection laws than those in your country of residence. In the event that your information is transferred in these ways, please note that we comply with applicable legal requirements governing the transfer of information across borders. By using the Services, you agree to and acknowledge these transfers.

Contacting us

If you would like further information on the collection, use, disclosure, transfer or processing of your Personal Data or the exercise of any of the rights listed above, please address questions, comments and requests to privacy@lacapm.com.

You can find out more information about your rights by contacting *the Information Commissioner's Office (ICO)*, the UK supervisory authority for data protection issues, or, as the case may be, any other competent supervisory authority of an EU member state.

Effective: 5 October 2022