



## PRIVACY NOTICE

Last Updated December 2019

Financial institutions like Jordan Park Group LLC ("Jordan Park") are required to provide privacy policy notices ("Privacy Notice") to their clients. Jordan Park believes that protecting the privacy of client Personal Information ("Personal Information") is of the utmost importance.

**Personal Information** means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular client or household, including nonpublic personal information that Jordan Park obtains in connection with providing a service or financial product to such client such as information regarding a client's account balance and investment activity.

This Privacy Notice describes the collection, protection and sharing of Personal Information of Jordan Park's clients, prospective clients and former clients. These policies apply only to individuals, either as accountholders or in their capacity as authorized representatives of an entity or trust, as well as visitors to our website and certain employee or applicant data. Throughout this Privacy Notice, "we," "our," or "us" refers to Jordan Park. For the purposes of European data protection laws, Jordan Park is the data controller of client Personal Information.

Jordan Park is committed to ensuring that our communications are accessible to individuals with disabilities. Individuals with disabilities can access this policy in alternative formats by contacting us at the address, phone, or email address below. This Privacy Notice is designed to meet content accessibility guidelines. To submit accessibility-related requests or report barriers to accessibility, please contact us at 888-413-0870 or contact us at [privacy@jordanpark.com](mailto:privacy@jordanpark.com).

This Privacy Notice is given to new clients upon entering into an agreement for Jordan Park's products or services and is distributed to all existing clients on an annual basis, or promptly thereafter in the event of substantive changes to our privacy policies. This Privacy Notice is reviewed on an annual basis, and Jordan Park reserves the right to update this Privacy Notice from time to time, including for changes in the businesses, our data practices, or the law. Jordan Park will inform its clients of any changes by updating this Privacy Notice on our website, or otherwise as required by law.

If you decide to close your account(s) or become an inactive client, we will adhere to the privacy policies and practices as described in this Privacy Notice.

## I. Personal Information We Collect

In the year prior to the date this Privacy Notice was issued, the Personal Information that we collected about our clients included name, address, telephone number, email address, social security number, birth date, tax identification number, state or country of tax residence(s), assets, income, employment history, investment experience and identification documents for anti-money laundering (“AML”) that may be received in account documents and related forms. We also may collect information such as account activity, investment activity and financial goals, and account balances related to a client’s transactions with Jordan Park, its affiliates (as may be applicable), or others, together with any other Personal Information required by applicable laws. We may collect personal information related to employee or applicant qualifications and work experience. Finally, we may collect technical information about your use of our website, including IP addresses and device identifiers.

We may collect Personal Information about our clients from different sources, including directly from our clients, as well as from third parties, including other financial institutions or referral sources. We may also automatically collect information through the use of cookies and other tracking technologies. Jordan Park does not respond to web browser “do not track” signals.

We use each of the categories of the Personal Information we collect to provide financial products and services to our customers, to market to existing and prospective customers, for information security and fraud detection, and for employment purposes with regard to employee or applicant data. Jordan Park will collect and use Personal Information in the course of business for tasks such as, the execution of account documents, for the legitimate interests of Jordan Park and to enable Jordan Park in complying with its legal and regulatory obligations. Where Jordan Park or its agents requires Personal Information to comply with AML policies or applicable legal requirements, failure to provide this information means Jordan Park may not be able to accept you as a client and may result in Jordan Park terminating its relationship with you.

Jordan Park will retain Personal Information for a minimum period of six years or for as long as required for us to perform the services, comply with applicable legal or regulatory obligations or for any other legitimate business reason.

## II. How We May Share Personal Information

Jordan Park may disclose each of the categories of the Personal Information we collect to third party service providers, governmental authorities, or to other third parties including other financial institutions as directed by the customer or otherwise required or permitted by law for the following business and commercial purposes:

- (i) Entering into account documents;
- (ii) Processing transactions and investments;
- (iii) Maintaining client records and providing centralized administrative and marketing services for current and prospective clients;
- (iv) Investigating and resolving complaints and recording calls and managing litigation;
- (v) Monitoring electronic communications and other IT systems for data security incidents, fraud or crime detection or for regulatory reasons;
- (vi) Complying with applicable AML policies;
- (vii) For employment and applicant evaluation purposes; and
- (viii) For other legal and regulatory obligations and reporting tax information to tax authorities.

The provision of Personal Information by a client may be necessary in order for Jordan Park to provide clients with the requested services, for the performance of any contractual relationship with that client,

in order for us to comply with any legal or regulatory obligations and for the other purposes as set out in the Privacy Notice where in Jordan Park's legitimate interests. Jordan Park does not disclose any Personal Information it collects about its client or former clients to anyone other than to its affiliates and certain service providers in connection with the administration, processing and servicing of client accounts or to its accountants, attorneys and auditors; as otherwise permitted or required by law, such as to respond to court orders and legal investigations or report to credit bureaus; or in the case of a merger, acquisition by another company, or sale of all or part of Jordan Park's assets. Jordan Park does not share Personal Information with third parties for those third parties' own marketing purposes.

Jordan Park does not and will not sell Personal Information of clients or former clients, and has not done so in the 12 months prior to the "Last Updated" date of this Privacy Notice.

### III. Your Privacy Rights

If you are a resident of California, you may have rights under the California Consumer Privacy Act of 2018 ("CCPA"), as described in this section of our Privacy Notice. In addition, this section of our Privacy Notice is not applicable to personal information processed solely in the business-to-business context, for instance, information about an individual acting in his or her capacity as a representative of a company, and other data that is exempt from the requirements of the CCPA.

**If you are located in the European Economic Area ("EEA"), you have a right to object to the processing of your Personal Information where that processing is carried out for Jordan Park's legitimate interest.**

#### *Requests for Household Information*

Please note that certain types of Personal Information may be associated with a household, meaning a group of people living together in a single home. Each member of the household must make requests for access or deletion of household Personal Information. We will then verify each member of the household using verification criteria. If we are unable to verify the identity of each household member to the degree of required certainty, we will not be able to respond to the request. We will notify you to explain the basis of our denial.

#### *Your Right to Request Disclosure of Information We Collect and Share About You*

Jordan Park is committed to ensuring that you know what information Jordan Park collects and shares about you. You can submit a request to Jordan Park for the following information:

- The categories of Personal Information that Jordan Park has collected about you.
- The categories of sources where Jordan Park collected the Personal Information.
- The business or commercial purposes for why Jordan Park collected the Personal Information.
- The specific pieces of information we collected.
- The third parties with whom Jordan Park shared the information.
- The categories of Personal Information that we've shared with service providers who provide services for us.

Our responses to any of these requests will cover the 12-month period preceding our receipt of the request. To exercise the right to request the disclosure of Personal Information that Jordan Park collects or shares about you, contact Jordan Park at [privacy@jordanpark.com](mailto:privacy@jordanpark.com) or 888-413-0870. Requests are typically free of charge.

## *Your Right to Request the Deletion of Personal Information We Have Collected from You*

Upon receiving and verifying such request, Jordan Park will delete the Personal Information that Jordan Park has collected about you, except for situations when that information is necessary for Jordan Park to: provide you with a good or service that the client requested; perform a contract Jordan Park entered into with you; maintain the functionality or security of our systems; comply with or exercise rights provided by the law; or use the information internally in ways that are compatible with the context in which you provided the information to Jordan Park or that are reasonably aligned with expectations based on the your relationship with Jordan Park.

To exercise the right to request the deletion of your Personal Information, contact Jordan Park at [privacy@jordanpark.com](mailto:privacy@jordanpark.com) or 888-413-0870. Requests for deletion of your Personal Information are generally free.

### *Our Process for Responding to Requests for Access or Deletion under the CCPA*

To respond to your request, we will ask you for certain pieces of personal information and endeavor to match those to information we maintain about you. The nature and number of verifying data elements we may request will depend on the nature of your request and the nature of the information we maintain about you. If we are unable to verify your identity with the degree of certainty required, we will not be able to respond to the request. In that case, we will notify you to explain the basis of our denial.

If you are legally entitled to such rights, you may designate an agent to submit a request on your behalf. The agent can be a natural person or a business entity that is registered with the California Secretary of State. If you would like to designate an agent to act on your behalf, you and the agent will need to comply with our agent verification process.

For requests for access or deletion, we will respond to your request or your authorized agent's request in writing, or verbally if requested, as soon as practicable and in any event generally not more than within 45 days after receipt of the request. We may extend this period to 90 days and, in the event that we do extend the period, we will explain to you or your authorized agent why we did so.

Please note that this subsection does not apply when an agent is authorized to act on your behalf pursuant to a valid power of attorney. Any such requests will be processed in accordance with California law pertaining to powers of attorney.

### *Non-Discrimination*

You have a right not to be discriminated against for the exercise of the privacy rights conferred by the CCPA.

## **IV. International Transfers**

If you are located in the EEA, Jordan Park may disclose Personal Information collected from you, to recipients located in countries outside of the EEA, including to the United States, which may not have data privacy laws equivalent to those in the EEA. By submitting your Personal Information to Jordan Park and the other recipients described in this Privacy Notice that are located in countries outside of the EEA, each client consents to the transfer of their Personal Information to Jordan Park and the other recipients described in this Privacy Notice that are located in countries outside of the EEA. Clients may withdraw their consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

Individuals in the EEA have certain data subject rights which may be subject to limitations and/or restrictions. These rights may include the right to: (i) request access to and rectification or erasure of their Personal Information; (ii) obtain restriction of processing or to object to processing of their Personal Information; and (iii) the right to ask for a copy of their Personal Information to be provided to them, or a third party, in a digital form. If you are located in the EEA and wish to exercise any of these rights, you should contact Jordan Park. Individuals in the EEA also have the right to lodge a complaint about the processing of their Personal Information with their local data protection authority.

## V. Information Security

Jordan Park is committed to maintaining your trust and confidence. Jordan Park restricts access to Personal Information it collects about its clients to its personnel who need to know that information to provide products or services to clients. We employ reasonable information security policies and procedures based on recognized industry standards to protect your information, such as the use of physical, technical, and procedural controls in keeping with federal standards to safeguard its clients' Personal Information. Jordan Park employees are also trained regarding the appropriate handling of client Personal Information.

However, no security system is impenetrable. In addition, no transmission or electronic storage of information is guaranteed to be secure. Jordan Park thus underscores to clients that they should always use caution when transmitting information via the Internet, select strong and unique passwords that are not reused at any otherwise, protect the confidentiality and security of their online passwords, and to immediately alert us to any concerns with your account or passwords. Please always use caution when transmitting information over the Internet, use strong and unique passwords that you do not also use on other online services, and notify us immediately of any concerns with your account or passwords.

## VI. Children's Privacy

Jordan Park's services are not intended for and are not directed to children. We do not knowingly collect or store any Personal Information about children under 16 years of age without parental consent.

## VII. Contact Us

If you have any further questions about our Privacy Notice or practices, please contact us at:

Jordan Park Group LLC

100 Pine Street, Suite 2600  
San Francisco, CA 94111  
[privacy@jordanpark.com](mailto:privacy@jordanpark.com)  
888-413-0870