

Side Letter Vault, LLC® (the “Company”, “we”, or “us”) is committed to respecting your privacy and the personal information you share with us in accordance with our policies. This Privacy Policy (“Policy”) applies to you if you: (1) use this website (this “Website”); (2) receive marketing emails from the Company; (3) conduct business with the Company or one of its affiliates services, including receiving services for you or your company and / or provide services to the company; and (4) any time you contact the Company through the Website, via email, or otherwise, submit a request for information, proposals, or engage in any other activity through the Website in which personal information is provided to us. The information below describes the manner in which the Company uses and protects your personal information once received. If you are our client (including our client’s employees or related persons), the Company reserves the right to issue separate privacy terms to you directly or by posting the terms on another website through which the client receives services.

The Company reserves the sole discretion to change this policy by updating this page. You should review this page periodically to ensure that you are comfortable with any changes.

Details about collection and use of data

The information we collect varies depending on your activity and use of the services or products offered by the Company. This Policy describes our practices with respect to the Scope described above. Other websites that the Company provides as a service to clients have their own dedicated websites and privacy policies, which you can find on the applicable website.

Categories of Personal Information

We collect the following categories of personal information:

- **Contact and / or Personal Information** – including your name, telephone number, address, and email address, account information, information submitted to enable us to provide our services, fund documents, investor information, contractual requirements, and other information you (or a third party acting on your behalf) provide to the Company, including without limitation through our the Company portal or send to the Company by email, verbal communication, or other electronic means. Additionally, if you apply to a Company job, we may also ask you to provide additional personal data as part of our job application process. By submitting information to the Company on or through this Website or through any other means, you acknowledge that you have read this Policy, understand it, agree to its terms, and authorize the Company to collect, use and disclose information pursuant to this Policy.
- **Data on how you use this Website** – including your URL clickstreams, pages viewed, how long you view our pages, how often you visit our Website, and other similar information
- **Browsing information** – including the website you came from, the website you visit next, and other similar information. Such information is collected through cookies and other technologies described below. We do not use and does not intend to use such information to personally identify an individual.
- **Cookies** – We use cookies when you use this Website. These may be session cookies, meaning they delete themselves when you leave the Website, or persistent cookies which do not delete themselves and help us recognize you when you return so we can provide a tailored service. However, you can block our usage by adjusting your browser settings to refuse cookies.

Recipients / Categories of Recipients

Your personal information may be shared with:

- **Our Affiliates** – When you provide the information above, it is received by the Company, its representatives, and may also be received by its affiliated entities, including Fairview®, LLC, Fairview® Investment Services, LLC, FilePoint® EDGAR Services, LLC; Fairview® Investment Administration, LLC; Fairview® Performance Services, LLC; Fairview® Cyber, LLC (“Affiliates”). In such cases, the Affiliates receiving the information are subject to this Privacy Policy. Company’s Members are employed by and / or maintain ownership in other entities.
- **Our service providers** – Including, as applicable, IT service providers, commercial email providers, security consultants, payment processors, and other vendors we engage so that they may provide services to us or on our behalf.
- **Other third parties** – Pursuant to a regulatory request or subpoena or and / or when we believe it is required by, or necessary to comply with, applicable law. We may also provide your personal information to third parties when you (or your employer or service provider) ask us to do so.

Data Retention and Protection

Your personal data is generally stored until we receive a request to remove it or as otherwise required by internal policies and procedures, applicable law and / or contractual terms. Data we collect is stored in the United States and is subject to our privacy policy, except when data is submitted to Company outside of the United States. If data is submitted to Company outside of the United States, then the data storage and processing may vary depending on the sender’s location and method of submission. The Company uses reasonable physical and technical measures to prevent unauthorized access or loss, and / or unlawful processing. Usage of this Website is not permitted outside of the United States.

We do not use your personal data for automated decision-making or profiling, which have a legal or similarly significant effect on users.

Information about processing of personal data

Purpose for Processing

The personal data we collect will be used for the following purposes:

- **Marketing purposes** – including sending you emails regarding regulatory updates, service offerings, and other content.
- **Internal business operations** – including (1) processing the information through our website and in providing you with our software and / or services; (2) compliance with our legal obligations; (3) in response to court orders or regulatory requests and in exercising our legal rights; (4) in protecting our and our clients’ rights and property; and / or (5) screening and other activities in connection with your employment or other engagement.

Legal Bases for Processing

Our legal basis for processing your personal data that we receive through the Website is based one or more of the following legal bases:

- **Your consent** – by submitting Information to the Company electronically, including without limitation through this Website, the user acknowledges that he or she has read this Policy, understands it, agrees to its terms, and authorizes the Company to collect, use and disclose Information pursuant to the terms of this Policy;
- **To comply with your instructions;**
- **As is necessary for our legitimate interests**– this may include direct marketing or fulfilling a service obligation; and / or
- **To comply with the law and our legal obligations.**

Know Your Rights

You have various legal rights regarding how your personal data is collected and processed. Your rights vary depending on the jurisdiction and laws applicable to you, which may include those described below. Where applicable, you may exercise your rights by contacting us as provided below in “Contact Us with Any Questions or Concerns.” In reviewing your request, we may request additional information, as reasonably necessary to understand and authenticate the request.

- **The right to access information we hold on you.**
If applicable, you may request additional information about: (1) the categories of data we are processing; (2) the purposes of data processing; (3) the categories of third parties to whom the data may be disclosed; (4) how long the data will be stored (or the criteria used to determine that period); (5) your other rights regarding our use of your data. We will provide you with the information within one month of your request, unless doing so would adversely affect the rights and freedoms of other (e.g. another person’s confidentiality or intellectual property rights). We will notify you if we cannot meet your request for that reason.
- **The right to opt-out of marketing communication.**
If you have previously given consent to our processing your data, you can freely withdraw such consent at any time. You can do this by emailing us at clients@sidelettervault.com or by selecting “unsubscribe” from the relevant marketing communication. If you withdraw your consent, and if we do not have another legal basis for processing your personal information, then we will stop processing it. If we do have another legal basis for processing your information, then we may continue to do so subject to your legal rights. You may also object to processing of your data if processing is based on a legitimate interest.
- **The right to remove or erase personal data or contact information (“right to be forgotten”).** You can do this by asking us to erase any personal data we hold about you, if it is no longer necessary for us to hold the data for purposes of your use of the Website.
- **The right of data portability where we process your personal information based on your consent.** You may ask us to transfer your personal data to you or another third party upon request by contacting us at clients@sidelettervault.com.
- **The right to correct any inaccurate personal information about you that is incorrect or incomplete. You also have the right to restrict or suspend processing of your personal data or correct.**

You can complete any or all the above by sending a request to clients@sidelettervault.com.

- **The right to submit a complaint.** If you have questions or complaints regarding our Policy or our privacy practices, please contact us at clients@sidelettervault.com. While we would appreciate the opportunity to address your concerns, you may also submit complaints to relevant supervisory authorities.
- **California Privacy Rights** Under California Civil Code Section 1798.83 (the “Shine the Light”), California residents may request and obtain a list of personal data we disclose to third parties for their own direct marketing purposes in the preceding calendar year and the names and addresses of those third parties. Requests may be made once a year per person to the email address below and are free of charge. We do not disclose personal data protected under the “Shine the Light” law to third parties for their own direct marketing purposes.

Links to Third-Party Sites

For your convenience and informational purposes, this Website may include hyperlinks to third-party websites. We do not attest to the content found on those sites and the user assumes the risk of use. Once you have left our Website, you should check the applicable privacy policy of the third-party website to determine how they collect information from you.

Children’s Privacy Protection

This Website is not directed towards children under 13 years of age, and Side Letter Vault®, LLC does not knowingly collect any information from children under 13 years of age through this Website. If you are under 13 years of age, you are not permitted to submit any information to Side Letter Vault®, LLC through this Website or any other means.

No Rights of Third Parties

This Policy does not create rights enforceable by third parties.

Changes to this policy

The Company reserves the sole discretion to change this policy by updating this page. We will use reasonable efforts to notify you of any material changes to this policy, such as by sending you the revised policy by email or posting a notice on our website. This policy is effective from November 2020.

Contact Us with Any Questions or Concerns

Please contact clients@sidelettervault.com if you have any questions or concerns regarding our collection, use or disclosure of your personal information.

Side Letter Vault, LLC
clients@sidelettervault.com