

## California Consumer Privacy Act of 2018 (“CCPA”) Disclosure

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The CCPA gives consumers who are residents of California certain rights with respect to “personal information” that is collected or used by a business. Generally, “personal information” is information that identifies, relates to, or can be linked to a particular consumer or household. However, the CCPA does not apply to personal information collected by financial institutions subject to the Gramm-Leach-Bliley Act (“GLBA”). Since Brinker Capital typically collects only the types of personal information that are covered by the GLBA, the CCPA rights disclosed below do not apply to most of the personal information collected by Brinker Capital.

### *Collection and Disclosure of Personal Information*

In the past 12 months, we have collected and disclosed to third parties for our business purposes the following categories of personal information covered by the CCPA:

- Identifiers, such as your name, address, email address, and phone number;
- Personal information, such as a signature or driver’s license number;
- Age, gender or gender identity, marital status, or other protected characteristics;
- Geolocation data, such as device location and Internet Protocol (IP) location;
- Professional or employment-related information;
- Commercial information, such as transaction information;
- Audio, electronic, visual, and similar information, such as call and video recordings; and
- Internet or other electronic network activity information, such as information regarding your interaction with our website.
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We collect the information listed above from:

- You and your representative;
- Government entities; and
- Our service providers.

### *Purposes For Which We Use Your Personal Information*

During the past 12 months, we have used personal information covered by the CCPA to provide services and to operate, develop, and improve our business and the products and services we offer to our clients. For example, we use personal information:

- To maintain and service accounts, including processing transactions, providing client service, and communicating with clients;
- To deliver marketing and promotional communications that we believe may be of interest to our clients;
- To personalize our clients' experience with us;
- To detect security incidents and protect against malicious, deceptive, fraudulent, or illegal activity; and
- For our business purposes, such as risk control, data analysis, audits, developing new products and services, debugging and enhancing our website, improving the products and services we provide to you, and identifying usage trends and determining the effectiveness of our promotional campaigns.

### *Consumer Rights Under the CCPA*

If you are a California resident, you have the following rights with respect to personal information that is subject to the CCPA:

1. The right to ask us to disclose what personal information we have collected, used, or disclosed about you.
  - To make a request for disclosure, email us at [compliancemembers@brinkercapital.com](mailto:compliancemembers@brinkercapital.com) or call us at (800) 333-4573.
  - We will use the process described below to verify the identity of anyone who requests your personal information.
  - You can ask us to provide this information to you up to twice in any 12-month period.
  - You may ask us to disclose information in any of the categories listed above under "Collection and Disclosure of Personal Information."
  - We will not disclose information that we are prohibited from disclosing by applicable law. For example, the CCPA prohibits us from disclosing your Social Security Number or account password.
2. The right to ask us to delete the personal information that we have collected from you.
  - To make a request for deletion, email us at [compliancemembers@brinkercapital.com](mailto:compliancemembers@brinkercapital.com) or call us at (800) 333-4573.
  - We will use the process described below to verify the identity of anyone who requests deletion of your personal information.
  - We are not required to delete your personal information if an exception under the CCPA applies, such as if we need it to provide services you requested or to comply with a legal obligation.

3. The right not to be discriminated against for exercising your privacy rights.
  - We cannot treat you differently, such as by charging you different prices, because you chose to exercise your privacy rights.
  - This rule does not prohibit us from offering different prices that are directly related to the value of your information to us.

#### *Verifying a Request to Disclose or Delete*

In order to protect your information from unauthorized disclosure or deletion, we will not disclose any information unless we believe that the person making the request is you or your authorized agent. To verify the identity of the requestor, we will ask for your name, address, and email address. We will also ask you for an additional piece of information to match information we already know about you, such as the last 4 digits of your Social Security Number, the last transaction you made, or a recent account balance. We may send an email or text message with an authentication code to a device you have used previously to communicate with us. If you have a password-protected account with us, we can verify your identity by using your account authentication credentials.

If you have authorized someone else (an “authorized agent”) to request information on your behalf, you must give the agent your written and signed permission. We may request that you identify yourself directly and confirm that you have authorized the agent to submit the request on your behalf.

#### *Protection of Children’s Personal Information*

We recognize the importance of protecting the privacy of children’s personal information. We do not knowingly collect personal information from anyone under the age of 16. If you believe that a child younger than 16 has provided personal information to us, please [contact us](#).

#### *Sales of Personal Information*

Brinker Capital does not “sell” personal information. For purposes of this Disclosure, “sell” means to disclose the information to a third party for monetary or other valuable consideration.

**For questions or concerns about Brinker Capital’s Privacy Policy and practices, please call 800-333-4573 and ask for your Client Services Representative.**