

Website Privacy Policy Notice:

Privacy Policy

General Privacy Policy. Churchill Management Group and its affiliates, including Chartwell Family Office, LLC (“Churchill”), is providing this notice to describe our policy to protect our client and partnership investors’ personal information. We believe that all of our clients and investors in partnerships of which Chartwell Family Office, LLC is the general partner (together, with applicants to establish these relationships, “Clients”) value their privacy, so it is our policy not to disclose personal information to anyone unless it is required or permitted by law, is at the Client’s direction, or is necessary to provide our Clients with our services. Churchill has not and does not sell our Clients’ personal information to third-party marketers. Churchill collects and maintains personal information from our Clients to provide investment management services and facilitate the investment in partnerships. The types and categories of information that we collect and maintain include:

- Information a Client gives us on applications or other written communication and during telephone and in person meetings when the Client establishes an investment advisory relationship or in connection with a partnership investment (which information consists of the Client’s identification and contact information, age, occupation, home address, email address, telephone number, financial information and goals, asset, income and expense profiles, risk tolerance, tax identification numbers, and such additional financial information as we need to provide our services to such Client);
- Information generated by a Client’s other service providers, such as brokerage and custodians, to service client or investor accounts (such as trade tickets, account statements, tax information reports, trade confirmations, confirmations of contributions and withdrawals and similar account information);
- Information potential clients give us on the contact page of our website and the information given to us by potential clients who meet with us to learn more about our firm and our services (this includes basic contact information, basic financial information, such as the person’s age, occupation, family obligations, qualifications as an investor and his or her investable assets, and investment goals); and
- Information we receive from third party solicitors with respect to potential clients or investors accounts (such as names, email addresses, phone numbers and/or mailing addresses).

To provide services to our Clients, Churchill does disclose personal information in very limited instances, which include:

- Disclosures to companies – subject to strict confidentiality agreements – that perform services on our behalf (such as technology consultants who assist us in maintaining our computer systems, companies that provide operational services for reconciliation of accounts, and companies that provide shredding services);
- Disclosures to companies as permitted by law, including those necessary to service Client accounts (such as providing account information to brokers and custodians, investor information to private fund administrators, accountants and other fund service providers); and
- Disclosures to third party solicitors who introduce us to Clients (such as the account statements of the introduced Clients).

To fulfill its privacy commitment, except as described above, Churchill restricts access to non-public personal information about our Clients to our employees who need to know such information and maintain physical, electronic, and procedural safeguards that comply with federal standards to guard Clients’ personal information. Currently, Churchill has adopted an information security policy that provides it will conduct employee training regarding safeguarding personal information, conduct risk assessments and use readily

available security measures to periodically monitor systems and assets to identify data security events, impose reasonable data access controls, not store consumers' personal information on its network in clear text, and have a process to secure and inventory devices with access to personal information. If applicable, please contact our office to obtain a copy of our most recent ADV2.

Website and Marketing Privacy Policy. In addition to the information we gather about Clients, as described above, we gather limited personal information from certain users of our website. We believe that such website users also value and respect their privacy. The categories of information we collect from website users includes contact information users may provide at the "Contract Us" location on the website. We collect this information to respond to website users' request for us to contact them, and we do not share this information with anyone outside of our firm. We do not collect other data, including IP addresses or any financial information that a user may provide if he or she completes the financial plan questionnaire on our website. We do not and will not sell or share any of this information with anyone outside our firm, except our service providers as described above.

For California Residents: If we have your information as a result of your visit to our website, a third party providing your information to us or your meeting with us, you have the following rights (1) to request a description of the categories information we have collected about you in the last 12 months, (2) to request the specific pieces of personal information we have about you, and (3) to request a copy of the information we have about you twice in a 12-month period. We will provide that information to you within 45 days of such a request. Before we send you such information, however, we will use reasonable efforts to verify that the request is from you depending on the request. You also have the right to request that we delete your personal information from our records, except to the extent we are required by law to retain any record. We will request you to verify such a request to delete your data in the same manner.

Please contact us if you would like more information about any of the above data collection practices, or how to request us to send you your data or to delete your data, or if you are disabled and you need a copy of this notice prepared for you in a manner that is accessible. Any such request may be made via our toll-free phone number (877-937-7110).

The effective date of our current privacy policy is January 1, 2020