

## **Privacy Policy as of March 12, 2021**

This Privacy Policy describes how Churchill Management Group and its affiliates, including Chartwell Family Office, LLC (collectively, “Churchill”, “we”, “us”, or “our”) collects, uses and shares your personal information if you visit churchillmanagement.com or our other websites or services that link to this Privacy Policy, or engage with our representatives over the phone or in our offices, or otherwise use or receive our investment advisory or financial planning services, contact us, receive our communications or attend our events (collectively, the “Services”).

### **Personal Information We Receive**

Churchill collects and maintains personal information from our potential or existing investment advisory clients and potential or existing investors in our private investment partnerships (“Clients”) to provide investment advisory or financial planning 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 any additional financial information as we need to provide or market our services to such Client);
- Information generated by a Client’s other service providers, such as brokerages 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, referral sources, service providers or others give us on our website directly or via other marketing sources. The information given to us by potential clients who show interest in learning more about our firm and our services include basic contact information and 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 (this may include names, email addresses, phone numbers and/or mailing addresses).

## **Cookies and Other Information Collected by Automated Means**

We, our service providers, (such as email providers, cloud-based hosting services, authentication vendors, customer relationship/database vendors, IT services, credit history verification services, website analytics and advertising service providers) may automatically log information about you, your computer or mobile device, and activity occurring on or through the Services. The information that may be collected automatically includes your computer or mobile device operating system type and version number, manufacturer and model; device identifier; browser type; screen resolution; IP address; the website you visited before browsing to our website; general location information such as city, state or geographic area; and information about your use of and actions on the Services, such as pages or screens you viewed, how long you spent on a page or screen, navigation paths between pages or screens, information about your activity on a page or screen, access times, and length of access. We and our service providers and business partners may collect this type of information over time and across third-party websites and mobile applications.

See our Cookie Policy (<https://www.churchillmanagement.com/cookie-policy/>) for more information and the section entitled, Your California Privacy Rights, for information on your choices regarding some of these tools if you are a California resident.

## **How We Use Your Personal Information**

We use your personal information for the following purposes and as otherwise described in this Privacy Policy or at the time of collection:

**To provide the Services.** We use your personal information to:

- provide, operate, and improve the Services;
- establish and maintain your user profile on the Services;
- communicate with you about the Services, including by sending you announcements, updates, security alerts, and support and administrative messages;
- understand your interests and personalize your experience with the Services;
- provide support and maintenance for the Services; and
- respond to your requests, questions and feedback.

**For research and development.** We analyze use of the Services to improve the Services and to develop new products and services.

**To send you marketing and promotional communications.** We may send you marketing communications as permitted by law. You can opt out of our marketing and promotional communications as described below.

**To comply with law.** We use your personal information as we believe necessary or appropriate to comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas or requests from government authorities.

**For compliance, fraud prevention, and safety.** We may use your personal information and disclose it to law enforcement, government authorities, and private parties as we believe necessary or appropriate to: (a) protect our, your, or others' rights, privacy, safety, or property (including by making and defending legal claims); (b) enforce the terms and conditions that govern the Services; and (c) protect, investigate, and deter against fraudulent, harmful, unauthorized, unethical, or illegal activity.

**With your consent.** In some cases, we may specifically ask for your consent to collect, use, or share your personal information, such as when required by law.

**To create anonymous data.** We may create aggregated and other anonymous data from your personal information and other individuals whose personal information we collect. We make personal information into anonymous data by removing information that makes the data personally identifiable to you. We may use this anonymous data and share it with third parties for our lawful business purposes, including to analyze and improve the Services and promote our business.

### **With Whom We Share Your Personal Information**

We do not share your personal information with third parties without your consent, except in the following circumstances or as otherwise described in this Privacy Policy:

**Affiliates.** We may share your personal information with our affiliates for purposes consistent with this Privacy Policy.

**Service providers.** We may share or provide access to your personal information with third-party companies and individuals that provide services on our behalf or help us operate the Services (such as customer support, hosting, analytics, email delivery, marketing, database management services, shredding services, and services for reconciliation of accounts). These third parties may use your personal information only as authorized by their contracts with us.

**Professional business relationships.** We may sometimes share your personal information with professional business relationships or enable them to collect information directly via our Services such as brokerage firms, other sources of referral, legal and tax professionals, loan service providers, plan administrators, third party solicitors and software providers, which provide financial services to our clients. For example, we currently work with brokerage firms and custodians to audit account details and identify potential clients via a referral program.

**Professional advisors.** We may disclose your personal information to professional advisors, such as lawyers, bankers, auditors, and insurers, where necessary in the course of the professional services that they render to us.

**For compliance, fraud prevention and safety.** We may share your personal information for the compliance, fraud prevention and safety purposes described above.

**Government requests.** Notwithstanding anything to the contrary in this policy, we may preserve or disclose your information if we believe that it is reasonably necessary to comply with a law, regulation, or legal request or to protect the safety, property, or rights of Churchill or others. However, nothing in this policy is intended to limit any legal defenses or objections that you may have to a third party or government request to disclose your information.

**For business transfers.** We may sell, transfer, or otherwise share some or all of our business or assets, including your personal information, in connection with a (potential) business transaction such as a corporate divestiture, merger, consolidation, acquisition, reorganization or sale of assets, or in the event of bankruptcy or dissolution.

## **Security**

Except as described above, Churchill restricts access to non-public personal information to our employees who need to know such information and maintains 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

## **Do Not Track.**

Some Internet browsers may be configured to send "Do Not Track" signals to the online services that you visit. We currently do not respond to "Do Not Track" or similar signals.

## **International Data Transfers**

We are headquartered in the United States and have service providers in other countries, and your personal information may be transferred outside of your state, province, or country to the United States or other locations where privacy laws may not be as protective as those in your state, province, or country.

## **Children**

The Services are not directed to, and we do not knowingly collect personal information from anyone under the age of 16. If we learn that we have collected personal information of a child without the consent of the child's parent or guardian, we will delete it. We encourage parents with concerns to contact us at 877-937-7110.

## **Changes to this Privacy Policy**

We may amend this Privacy Policy at any time about the Services and indicating the effective date of the amended version. We may announce any material changes to this Privacy Policy through the Service and/or via email if we have your email address so it is important to

keep your email address up to date. In all cases, your continued use of the Services after the posting of any modified Privacy Policy indicates your assent to the amended Privacy Policy.

## **Your Nevada Rights**

You may review and request changes to your information or opt-out of the sale of your personal information at: 877-937-7110 or [info@churchillmanagement.com](mailto:info@churchillmanagement.com).

For California Residents:

## **Your California Privacy Rights**

**Shine Your Light Law.** Under California law, California residents are entitled to ask us for a notice identifying the categories of personal customer information that we share with certain third parties for marketing purposes and providing contact information for such third parties. If you are a California resident and would like a copy of this information, please submit a written request to us via email at [info@churchillmanagement.com](mailto:info@churchillmanagement.com). You must put the statement "Your California Privacy Rights" in your request and include your name, street address, city, state, and ZIP code. We are not responsible for notices that are not labeled or sent properly, or do not have complete information.

**CCPA.** In 2018, California passed a new law called the California Consumer Privacy Act (CCPA). If the CCPA is applicable to us and to you, you have the right to:

1. know the categories of personal information collected about you in the prior 12 months and its sources and business purpose;
2. know whether your personal information is sold or disclosed, and to whom, in prior 12 months;
3. access and then delete your personal information (subject to exceptions).

**Sale; Non-Discrimination.** We do sell your information as “sell” is defined under the CCPA. Technologies such as Google Analytics help us to understand and market to clients and potential clients. We use ad tech providers to retarget and serve advertising to user and website visitors. We do not discriminate in how we provide services based on your exercise of your privacy rights. To opt out please contact us at 877-937-7110 or at [info@churchillmanagement.com](mailto:info@churchillmanagement.com).

**Definition.** “Personal Information” is defined under CCPA to include information that identifies, relates to, describes, or is capable of being associated with a particular consumer or household.

**Personal information that we share.** We share personal information with service providers.

**Verification Process for Access or Deletion of your personal information.** If you would like to access or delete your personal information, we must, where data is identifiable, verify your identity as the requester. In some instances, you do not have a right under CCPA to have your

data deleted. Our verification process is depending on the nature of your interactions with us (such as whether you visited our website v. being a client), we will verify your request using appropriate information, which may include your email address. If you have created an account with us, we will also verify your request using the information associated with your account, including billing or shipping information. Government identification may be required. We cannot respond to your request if we cannot verify your identity and/or authority to make the request on behalf of another and confirm the personal information relates to you. Making a verifiable consumer request does not require you to create an account with us.

**Agents.** If you would like to exercise your access or deletion rights through an agent, please (a) provide the agent legally sufficient power-of-attorney documentation establishing the agent's rights to act on your behalf or (b)(1) provide the authorized agent signed permission to do so; (2) verify your own identity directly with us as provided above; and (3) directly confirm with us that you provided the authorized agent permission to submit the request.

**Questions About this California Rights Statement.** Contact us at 877-937-7110 or [info@churchillmanagement.com](mailto:info@churchillmanagement.com) or via the link on our website at churchillmanagement.com if you have questions or concerns about this statement. If you wish to exercise any of the above rights, including opting-out of any "sales" under CCPA, contact us at [info@churchillmanagement.com](mailto:info@churchillmanagement.com) or 877-937-7110. As noted above, you may also authorize an individual to submit a verifiable consumer request relating to your personal information.

**Process.** We will fulfill your request within 45 days of receiving your request. Please note that your request may be limited in certain cases, for example if complying with your request would conflict with:

- Federal, state or local law;
- Regulatory inquiries;
- Subpoenas; or
- Exercising or defending legal claims.

### **Contact Details**

Please contact us if you want to exercise your rights or if you are disabled and 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) or via e-mail at [info@churchillmanagement.com](mailto:info@churchillmanagement.com).

To review past privacy policy, please visit : <https://www.churchillmanagement.com/wp-content/uploads/2021/03/Website-Privacy-Policy-Notice-January-1-2020.pdf>