

## Privacy Addendum for California Residents

Last Updated on: August 16, 2024

This Privacy Addendum for California Residents (the “**California Addendum**”) supplements the information contained in the Privacy Notice for Strategas Securities, LLC and Strategas Asset Management, LLC (the “**Privacy Notice**”). This California Addendum applies solely to Strategas Securities, LLC’s (“**Strategas**”) collection, use, and sharing of personal information from individuals who reside in the State of California (“**consumers**” or “**you**”) and interact with Strategas online or offline, subject to the exemptions below. Unless otherwise defined in this California Addendum or the Privacy Notice, any terms defined in the California Consumer Privacy Act of 2018, (“**CCPA**”) have the same meaning when used in this California Addendum. If you are a California resident with disabilities and need to be provided with an accessible version of this California Addendum, please contact us at the contact information below.

The California Addendum does not apply to personal information outside the scope of the CCPA, including:

- Personal information publicly available from government records, deidentified or aggregate consumer information, or personal information covered by certain sector-specific privacy laws, including the Gramm-Leach-Bliley Act (“GLBA”), and implementing regulations, or the California Financial Information Privacy Act (“FIPA”), and the Driver’s Privacy Protection Act of 1994 (“DPPA”).
- Personal information bearing on a consumer’s credit worthiness, credit standing, credit capacity, character, general reputation, personal characteristics, or mode of living as set forth in the Fair Credit Reporting Act (“FRCA”).

### Information We Collect

When Strategas acts as a service provider for our clients, we collect personal information on behalf of our customers subject to our contractual obligations. When we act as service provider, we follow the instructions of our clients on how to process personal information on our client’s behalf. The provisions of the California Addendum do not apply to the personal information that we process as a service provider on behalf of our business clients.

The below chart lists the categories of personal information that we may collect and have collected in the past 12 months and how we disclose such information. We disclose such personal information for the business or commercial purposes described below.

Category of Personal Information	Categories of Service Providers and Third Parties with whom Personal Information is Disclosed
A. <b>Identifiers.</b> This may include a real name, postal address, Internet Protocol address, email address, account name, Social Security number, driver’s license number, passport number, or other similar identifiers.	Affiliates and subsidiary organizations of Strategas, service providers, prospective purchasers of our business, entities that we are required to disclose to pursuant to law or for legal proceedings, and governmental entities.
B. <b>Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).</b> This may include a name, signature, Social Security number, address, telephone number, passport number, driver’s license or state identification card number, employment, bank account number, or any other financial information, or medical information.	Affiliates and subsidiary organizations of Strategas, service providers, prospective purchasers of our business, entities that we are required to disclose to pursuant to law or for legal proceedings, and governmental entities.

Category of Personal Information	Categories of Service Providers and Third Parties with whom Personal Information is Disclosed
<b>C. Protected classification characteristics under California or federal law.</b> This may include age, citizenship, or marital status.	Affiliates and subsidiary organizations of Strategas, service providers, prospective purchasers of our business, entities that we are required to disclose to pursuant to law or for legal proceedings, and governmental entities.
<b>D. Commercial information.</b> This may include records of personal property, business records, property records, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	Affiliates and subsidiary organizations of Strategas, service providers, prospective purchasers of our business, entities that we are required to disclose to pursuant to law or for legal proceedings, and governmental entities.
<b>E. Internet or other similar network activity.</b> This may include browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	Affiliates and subsidiary organizations of Strategas, service providers, prospective purchasers of our business, entities that we are required to disclose to pursuant to law or for legal proceedings, and governmental entities.
<b>F. Professional or employment-related information.</b> This may include current job history, your resume, educational history, and other information required for an application.	Affiliates and subsidiary organizations of Strategas, service providers, prospective purchasers of our business, entities that we are required to disclose to pursuant to law or for legal proceedings, and governmental entities.
<b>G. Inferences drawn from other personal information.</b> This may include profile reflecting a person's preferences as it relates to client relationship references.	Affiliates and subsidiary organizations of Strategas, service providers, prospective purchasers of our business, entities that we are required to disclose to pursuant to law or for legal proceedings, and governmental entities.

**Sources of Personal Information**

Strategas obtains the categories of personal information listed above directly from you (such as from forms or applications you complete, or through direct interactions with Strategas over the phone, through email, or other communication mediums) or from other sources, including service providers that help us manage our business and market to you, Strategas' customers, our investment and financial partners, social media networks, governmental records, and publicly available information on the internet.

**Use of Personal Information**

We have used or disclosed the personal information we collect for one or more of the following business or commercial purposes:

- To fulfill or meet the reason you provided the information.
- To create, maintain, customize, and secure your account with us.
- To process your requests, transactions and payments and prevent transactional fraud.
- To provide you with services, products, or support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To communicate with you and better understand our customers, including to market our products and services to you.
- To improve our products and services, including our online platforms and websites.

- To help maintain the safety, security, quality, and integrity of our website, products and services, databases and other technology assets, and business, including to detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, and prosecute those responsible for that activity, and to debug to identify and repair errors that impair existing intended functionality.
- To respond to law enforcement requests, outside auditors and lawyers and as required by applicable law, court order, or governmental regulations and to comply with applicable laws.
- Performing services on behalf of another business or service provider, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing advertising or marketing services, providing analytic services, or providing similar services on behalf of the business or service provider.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.

Strategas will not collect additional categories of personal information or use the personal information we collected for additional purposes without providing you notice.

### **Sales and Sharing of Personal Information**

Strategas does not “sell” or “share”, and has not sold or shared in the past 12 months, your personal information as defined in the CCPA.

### **Retention Period**

Strategas retains the information listed above in accordance with its data retention policies or as otherwise may be required by law. Strategas uses the following standards to determine retention periods: the time required to fulfill business purposes, maintain business records, and comply with legal obligations.

### **Your Rights and Choices**

The CCPA provides consumers (California Residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

### **Access to Specific Information and Data Portability Rights**

You have the right to request that Strategas disclose certain information to you about our collection of your personal information. Once we receive and confirm your verifiable consumer request (see *Exercising Access, Data Portability, Deletion, and Correction Rights*), we may disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we disclose that personal information.
- The specific pieces of personal information we collected about you.
- If we disclosed your personal information for a business or commercial purpose, a list disclosing the personal information categories that each category of recipient obtained.

### **Deletion and Correction Request Rights**

You have the right to request that Strategas delete any of your personal information that we collected or maintained and the right to correct inaccurate personal information that Strategas maintains about you, subject to certain exceptions. Once we receive and confirm your verifiable consumer request (see *Exercising Access, Data Portability, Deletion, and Correction Rights*), we may delete and/or correct (and

direct our service providers to delete and/or correct) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

1. Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *et seq.*).
4. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
5. Comply with a legal obligation.
6. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

The list of exceptions above is not exhaustive, and we may also deny a deletion request as otherwise permitted by law.

### **Exercising Access, Data Portability, Deletion, and Correction Rights**

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by either:

- Calling (toll free) us at 1-855-242-7963.
- Click on “Contact Us” in the lower left corner at [www.strategasasset.com](http://www.strategasasset.com) or [www.strategasrp.com/](http://www.strategasrp.com/).
- Only you, or a person that you authorize to act on your behalf (an “Authorized Agent”), may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an Authorized Agent. To verify your identity, we may request up to three pieces of personal information about you, and we reserve the right to take additional steps as necessary to verify your identity if we have reason to believe a request is fraudulent.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We are unable to fulfill your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. With few exceptions, we will only review and fulfill a request from your Authorized Agent if (a) you grant the Authorized Agent written permission to make a request on your behalf, (b) you or the Authorized Agent provides us notice of that written permission, and (c) we are able to verify your identity in connection with that notice and the request.

Making a verifiable consumer request does not require you to create an account with us. However, we do consider requests made through your password protected account sufficiently verified when the request relates to personal information associated with that specific account.

We will only use personal information provided in a verifiable consumer request to verify the requestor’s identity or authority to make the request.

## **Response Timing and Format**

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to 45 additional days), we will inform you of the reason and extension period in writing.

If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

## **Non-Discrimination**

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

## **Changes to Our California Addendum**

Strategas reserves the right to amend this California Addendum. When we make changes to this California Addendum, we will post the updated notice on our website and update the effective date on this California Addendum. Your continued use of our website, products, or services following the posting of changes constitute your acceptance of such changes.

## **Contact Information**

If you have any questions or comments about this California Addendum, the ways in which Strategas collects and uses your information described in this California Addendum or in the Privacy Notice, your choices, and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us by either:

- Calling (toll free) us at 1-855-242-7963.
- Click on "Contact Us" in the lower right corner at [www.strategasasset.com](http://www.strategasasset.com) or [www.strategasrp.com/](http://www.strategasrp.com/).