

Enterprise Trust

# Privacy Policy

## April 2024





## Who We Are and Purpose of the Policy

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Enterprise Trust and Investment Company, Enterprise Trust Company, LLC, and their affiliates (together “Enterprise,” “we,” “us,” or “our”) believe that protecting the privacy of our current, former, and prospective investors, as well as our online visitors is important. The following privacy policy (“Privacy Policy”) explains how we collect, use, and disclose personal data (as defined below) from and about you through your interactions with us, including your interactions with our website, <https://enterprise-trust.com> (“Website”).

If you are a California Resident (as defined below), please review the below section, **Additional Information for California Residents**, for additional disclosures, our Notice at Collection, and a description of your rights under the California Consumer Privacy Act (with any implementing regulations and as may be amended from time to time, “CCPA”).

## What Personal Data We Collect and How We Collect It

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### Collection of Personal Data

We may collect personal data about you when you visit our Website, to facilitate your investments, and for our business and commercial purposes. “Personal data” for the purposes of this Privacy Policy means any information that can help us directly or indirectly identify you and, with regard to California residents only, personal information as defined under the CCPA.

Depending on how you interact with us, we may collect the following categories of personal data from or about you:

- identifiers and similar information such as, name, address, date of birth, email address, social security number, driver’s license number, passport number, online identifiers, or other similar identifiers;
- certain information protected under federal or state laws, like a signature, bank account, or other financial information.
- characteristics of protected classifications under certain federal or state laws, including, gender, national origin, or marital status;
- commercial information, including records of products or services purchased, obtained, or considered, or other purchasing histories or tendencies, including funds invested, investments considered, or sources of wealth;
- education information, including information that is not publicly available, personally identifiable information as defined in the Family Educational Rights and Privacy Act);
- internet or other electronic network activity information, including interactions with our Website or use of certain online tools;
- audio (e.g., voicemail), electronic, visual, or similar information;
- professional or employment-related information, including occupation, compensation, employer, and title;
- inferences drawn from any of the information identified above to create a profile reflecting your preferences or similar information, including your potential interest in investing in new funds; and
- sensitive personal information under the CCPA such as your passport number, driver’s license, state identification card, citizenship and immigration status, and account log-in and access code or credentials allowing access to an account.

### Sources of Personal Data

We may collect personal data about you directly from you and/or your intermediaries through sources such as: (i) account applications, subscription agreements, and other forms or related documentation; (ii) written, electronic, or verbal correspondence with us or our service providers; (iii) investor transactions; (iv) an investor’s brokerage or financial



advisory firm, financial advisor, or consultant; and/or (v) from information captured on applicable websites. In addition, we may collect personal data from different sources, such as: (i) our affiliates, our service providers, or our affiliates' service providers; (ii) public websites or other publicly accessible directories and sources, including bankruptcy registers, tax authorities, governmental agencies and departments, and regulatory authorities; and/or (iii) from credit reporting agencies, sanctions screening databases, or from sources designed to detect and prevent fraud. We may also collect personal data through our use of cookies, as described in more detail below.

## **Cookies and Similar Technologies and Do Not Track**

Our Website uses cookies for various purposes, including to distinguish you from other users of our Website and collect certain information about your interactions with our Website. This helps us to provide you with a good experience when you browse our Website and also allows us to improve our Website.

We may use third-party web analytics services on the Website, including Google Analytics. We use Google Analytics to help us understand how people are using our Website. To find out more about how Google Analytics collects and processes data, please click [here](#). Google Analytics has its own cookies that it uses to track and aggregate this information. You can prevent the use of Google Analytics relating to your use of our Website by downloading and installing the browser plugin available [here](#).

The Website may also include social media features, such as the Facebook Like button, and widgets, such as the Share This. These features may collect your IP address, which page you are visiting on the Website, and may set a cookie to enable the feature to function properly. Social media features and widgets are either hosted by a third party or hosted directly on our Website. Your interactions with these features are governed by the privacy statement of the companies that provide them.

Some web browsers may transmit “do not track” (“DNT”) signals. We currently do not respond to DNT settings in your web browser.

## **Embedded Content from Other Websites**

Articles on our Website may include embedded content (e.g., videos, images, articles, etc.). Embedded content from other websites behaves in the exact same way as if the visitor has visited the other website. These websites may collect data about you, use cookies, embed additional third-party tracking, and monitor your interaction with that embedded content, including tracing your interaction with the embedded content if you have an account and are logged in to that website.

## **Why We Collect Your Personal Data**

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We may collect or use personal data for any of the following business or commercial purposes: (i) performing services on behalf of a fund, including fulfilling your requests, maintaining or servicing accounts, providing investor relations service, processing subscriptions and withdrawals/redemptions, verifying information, processing payments, or providing similar services; (ii) communicating with you; (iii) performing our contractual and regulatory obligations to a subscriber to a fund, including providing updates on a fund's performance, providing tax reporting and other operational matters; (iv) detecting security incidents and protecting against malicious, deceptive, fraudulent, or illegal activity, including preventing fraud and conducting “Know Your Client,” anti-money laundering, terrorist financing, and conflict checks; (v) enabling or effecting commercial transactions; (vi) where permitted by applicable law, providing you with marketing or promotional materials; (vii) administering and improving our Website; and [(viii) internal operations, including



troubleshooting, data analysis, testing, research, statistical and survey purposes.

## How We May Share Your Personal Data

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We may share all of the personal data that we collect with our affiliates in order to service your account or provide you with information about services that may be of interest to you. Otherwise, we do not disclose any personal data about you, except: (i) to service providers, including administrators, banks, auditors, law firms, consultants, and placement agents; (ii) at your request or direction or with your consent; and/or (iii) as otherwise permitted or required by law or regulation, including, but not limited to, governmental organizations and self-regulatory organizations. Additionally, we may share personal data in the event we sell or transfer all or a portion of our business or assets (including in the event of a reorganization, dissolution, or liquidation).

Please note that for purposes of this section, “sharing” does not include “sharing” as defined under the CCPA. For additional disclosures and information on our CCPA practices, please see the below section **Additional Information for California Residents**.

## Security of Personal Data

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We will take reasonable steps to use security measures appropriate to the nature of the information to protect personal data against unauthorized access, exfiltration, acquisition, theft, or disclosure. Given the nature of information security, there is no guarantee that such safeguards will always be successful.

## How Long We Retain Your Personal Data

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How long we keep your personal data will vary depending on the type of personal data and our reasons for collecting it. The retention period will be determined by various criteria, including the purposes for which we are using it (as it will need to be kept for as long as is necessary for any of those purposes) and our legal obligations (as laws or regulations may set a minimum period for which we have to keep your personal information). In general, we will retain your personal data for as long as we require it to perform our contractual rights and obligations or for periods required by our legal and regulatory obligations.

## What Rights You Have Over Your Personal Data

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You can request to receive an exported file of the personal data we hold about you, including any data you have provided to us. You can also request that we erase any personal data we hold about you. This does not include any data we are obliged to keep for administrative, legal, or security purposes.

## Links to External Websites

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Our Website may contain links to third party websites. Any access to and use of such third-party websites is not governed by this Privacy Policy, but, instead, is governed by the privacy policies of those third-party websites. We are not responsible for the information practices of such third-party websites.



## Marketing to You

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We may send communications about our services and events to you. You can opt-out of these communications through the “unsubscribe” option in our email communications to you or by contacting us using the details in [How to Contact Us](#) below.

## Additional Information for California Residents

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The CCPA imposes certain obligations on us and grants certain rights to California residents (“California Resident,” “you” or “your”) with regard to “personal information.” If you are a California Resident, please review the following information about your potential rights with regard to your personal information under the CCPA. The rights described herein are subject to exemptions and other limitations under applicable law.

Terms used herein have the meaning ascribed to them in the CCPA. We are a “business.”

### Notice at Collection and Use of Personal Information

#### *Information We Collect*

Depending on how you interact with us, we may collect the categories of personal information listed above in the section [Collection of Personal Data](#).

#### *How We Use Collected Information*

We also may use personal information from you for the business or commercial purposes described above in the section [Why We Collect Your Personal Data](#).

#### *How Long We Keep Information*

We retain your personal information as described above in [How Long We Retain Your Personal Data](#).

#### *Sale or Sharing of Personal Information*

We do not sell or share your personal information (as such terms are defined under the CCPA).

For more information about our privacy practices, please review our entire Privacy Policy, which is available starting on the first page of this document.

### Our Collection, Use, and Disclosure of Personal Information and Sensitive Personal Information

#### *What Information We Have Collected, the Sources from Which We Collected It, and Our Purpose for Collecting It*

In the preceding 12 months, depending on how you interact with us, we may have collected the categories of personal information listed above in the section, [Collection of Personal Data](#). We may collect personal information from all or some of the categories of sources listed in the section, [Sources of Personal Data](#). We may collect all or a few of these categories of personal information for the business or commercial purposes identified in the section, [Why We Collect Your Personal Data](#).



***Our Disclosure of Personal Information***

We do not sell or share your personal information. We do not knowingly sell or share the personal information of minors under 16 years old. In the preceding 12 months, we may have disclosed for a business purpose the following categories of personal information to the following categories of third parties, as describe in the below chart:

Category of Personal Information	Category of Third Party
Identifiers (for example your name, address, DOB, SSN, driver’s license, passport number and online identifiers)	<ul style="list-style-type: none"> <li>• Counterparties and intermediaries (e.g., broker-dealers) in connection with investments and transactions or for operational purposes</li> <li>• Third parties as needed to complete a transaction, including financial institutions or advisors, entities that assist with fraud prevention, custodians, or lenders to or creditors of a fund</li> <li>• Professional services organizations, such as auditors</li> <li>• Any relevant third-party acquirer(s), in the event that we sell or transfer all or any relevant portion of our business or assets</li> <li>• Affiliated entities</li> </ul>
Additional information subject to Cal. Civ. Code § 1798.80(e) (for example, a signature, state identification card number, financial information, or bank account information)	<ul style="list-style-type: none"> <li>• Counterparties and intermediaries (e.g., broker-dealers) in connection with investments and transactions or for operational purposes</li> <li>• Third parties as needed to complete a transaction, including financial institutions or advisors, entities that assist with fraud prevention, custodians, or lenders to or creditors of a fund</li> <li>• Professional services organizations, such as auditors</li> <li>• Any relevant third-party acquirer(s), in the event that we sell or transfer all or any relevant portion of our business or assets</li> <li>• Affiliated entities</li> </ul>
Characteristics of protected classifications under certain federal or state laws (for example gender, age, national origin, citizenship, or marital status)	<ul style="list-style-type: none"> <li>• Professional services organizations, such as auditors</li> <li>• Any relevant third-party acquirer(s), in the event that we sell or transfer all or any relevant portion of our business or assets</li> <li>• Affiliated entities</li> </ul>
Commercial Information (for example records of products or services purchased, obtained, or considered or purchasing histories or tendencies including funds in which you are invested, investments considered or sources of wealth)	<ul style="list-style-type: none"> <li>• Counterparties and intermediaries (e.g., broker-dealers) in connection with investments and transactions or for operational purposes</li> <li>• Third parties as needed to complete a transaction, including financial institutions or advisors, entities that assist with fraud prevention, custodians, or lenders to or creditors of a fund</li> <li>• Professional services organizations, such as auditors</li> <li>• Any relevant third-party acquirer(s), in the event that we sell or transfer all or any relevant portion of our business or assets</li> <li>• Affiliated entities</li> </ul>
Education Information, including information that is not publicly available, personally identifiable information as defined in the Family Educational Rights and Privacy Act)	<ul style="list-style-type: none"> <li>• Any relevant third-party acquirer(s), in the event that we sell or transfer all or any relevant portion of our business or assets</li> <li>• Affiliated entities</li> </ul>
Audio (e.g., voicemail), electronic, visual, or similar information	<ul style="list-style-type: none"> <li>• Any relevant third-party acquirer(s), in the event that we sell or transfer all or any relevant portion of our business or assets</li> <li>• Affiliated entities</li> </ul>
Professional or Employment Related Information, including occupation, compensation, employer, and title	<ul style="list-style-type: none"> <li>• Any relevant third-party acquirer(s), in the event that we sell or transfer all or any relevant portion of our business or assets</li> <li>• Affiliated entities</li> </ul>
Inferences drawn from any of the information identified above to create a profile reflecting your preferences or similar information, including your potential interest in investing in new funds	<ul style="list-style-type: none"> <li>• Any relevant third-party acquirer(s), in the event that we sell or transfer all or any relevant portion of our business or assets</li> <li>• Affiliated entities</li> </ul>



In addition, in the preceding 12 months, we may have disclosed for all of the categories of personal information identified in “**Collection of Personal Data**” above, to the following categories of third parties: (i) judicial courts, regulators, or other government agents purporting to have jurisdiction over us, our subsidiaries or our affiliates, or opposing counsel and parties to litigation; and (ii) other third parties as may otherwise be permitted by law. We may disclose personal information to all of the third parties listed above to comply with our legal obligations or for the purposes identified in **Why We Collect Your Personal Data**.

We may also share your personal information with our service providers such as our administrator, IT providers, or CRM provider, other entities that have agreed to limitations on the use of your personal information, or entities that fit within other exemptions or exceptions in, or as otherwise permitted by, the CCPA.

#### ***Our Use and Disclosure of Sensitive Personal Information***

As noted above in **Collection of Personal Data**, under the CCPA, certain personal information we collect and process may be considered “sensitive personal information.” The CCPA requires that we provide you with the right to limit our use or disclosure of such sensitive personal information in certain circumstances. Currently, we are not using your sensitive personal information for purposes that would require that we provide you with a right to limit.

#### **California Residents’ Rights under the CCPA**

If your personal information is subject to the CCPA, you may have certain rights concerning that information, subject to applicable exemptions and limitations, including the right to: (i) be informed, at or before the point of collection, of the categories of personal information to be collected, and the purposes for which the categories of personal information shall be used; (ii) not be discriminated against because you exercise any of your rights under the CCPA; (iii) request that we delete any personal information about you that we collected or maintained, subject to certain exceptions (“Request to Delete”); (iv) opt-out of the “sale” (as that term is defined in the CCPA) of your personal information if a business sells your personal information (we do not); (v) opt-out of the “sharing” (as that term is defined in the CCPA) of your personal information if a business shares your personal information with third parties (we do not); (vi) limit the use and disclosure of sensitive personal information where required by the CCPA (“Right to Limit”) (please note that we are not using your sensitive personal information for purposes that would require that we provide you with a Right to Limit); (vii) correct inaccurate personal information (“Request to Correct”); and (viii) request that we, as a business that collects personal information about you and that discloses your personal information for a business purpose, disclose to you (“Request to Know”): (a) the categories of personal information we have collected about you; (b) the categories of sources from which we have collected the personal information; (c) the business or commercial purpose for collecting the personal information; (d) the categories of third parties with which we share personal information; and (e) the specific pieces of personal information we have collected about you.

The CCPA does not restrict our ability to do certain things like comply with other laws or comply with regulatory investigations. In addition, the CCPA does not apply to certain information like personal information collected, processed, sold, or disclosed pursuant to the federal Gramm-Leach-Bliley Act and its implementing regulations. We also reserve the right to retain, and not to delete, certain personal information after receipt of a Request to Delete from you where permitted by the CCPA or another law or regulation.

#### **How to Submit a Request under the CCPA**

You may submit a Request to Know, Request to Delete or Request to Correct (“Consumer Rights Request”) as described above, through the following toll-free telephone number **408-358-5811**, through our Website at the following link: <https://www.enterprise-trust.com/contact.php>, or email us at [enterprise@enterprisetrust.com](mailto:enterprise@enterprisetrust.com).



We are only required to respond to verifiable Consumer Right Requests made by you or your legally authorized agent. When you submit a Consumer Rights Request, we may ask that you provide clarifying or identifying information to verify your request. Such information may include, at a minimum, depending on the sensitivity of the information you are requesting and the type of request you are making, your name and email address. Any information gathered as part of the verification process will be used for verification purposes only.

You are permitted to designate an authorized agent to submit a Consumer Rights Request on your behalf and have that authorized agent submit the request through the aforementioned methods. In order to be able to act, authorized agents have to submit proof that they are authorized to act on your behalf, or have a power of attorney. We may also require that you directly verify your own identity with us and directly confirm with us that you provided the authorized agent permission to submit the request.

## Changes to this Privacy Policy

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We reserve the right to change this Privacy Policy at any time. Revised versions of the Privacy Policy will be made available on this Website, and to investors via email. You may have additional rights under other foreign or domestic laws that may apply to you, including as set forth in additional privacy notices.

## How to Contact Us

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This Privacy Policy is available in alternative formats upon request. If you have any questions concerning this Privacy Policy, or to request this Privacy Policy in an alternative format, please contact us at [enterprise@enterprise-trust.com](mailto:enterprise@enterprise-trust.com).





FACTS	WHAT DOES ENTERPRISE DO WITH YOUR PERSONAL INFORMATION?	
Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.	
What?	<p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> <li>▪ Social Security number and income</li> <li>▪ Assets and account balances</li> <li>▪ Investment experience and risk tolerance</li> </ul> <p>When you are no longer our client, we continue to share your information as described in this notice.</p>	
How?	All financial companies need to share clients' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their clients' personal information; the reasons Enterprise chooses to share; and whether you can limit this sharing.	
Reasons we can share your personal information	Does Enterprise share?	Can you limit this sharing?
<b>For our everyday business purposes—</b> such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
<b>For our marketing purposes—</b> to offer our products and services to you	Yes	No
<b>For joint marketing with other financial companies</b>	No	We don't share
<b>For our affiliates' everyday business purposes—</b> information about your transactions and experiences	Yes	No
<b>For our affiliates' everyday business purposes—</b> information about your creditworthiness	No	We don't share
<b>For our affiliates to market to you</b>	Yes	Yes
<b>For non-affiliates to market to you</b>	No	We don't share
<b>To limit our sharing</b>	<ul style="list-style-type: none"> <li>▪ Mail the form below</li> </ul> <p><b>Please note:</b></p> <p>If you are a new client, we can begin sharing your information thirty (30) days from the date we sent this notice. When you are no longer our client, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.</p>	
<b>Questions?</b>	Call (408) 358-5811 or go to <a href="http://www.enterprise-trust.com">www.enterprise-trust.com</a>	



**MAIL-IN FORM**

If you have a joint account, your choice(s) will apply to everyone on your account unless you mark below

Apply my choices only to me

Mark if you want to limit:

Do not allow your affiliates to use my personal information to market to me.

Name

Address

City, State, Zip

Account #

**Mail to:**

**CA:**  
Enterprise Trust and Investment Company  
15425 Los Gatos Blvd, Suite 150  
Los Gatos, CA 95032

**NV:**  
Enterprise Trust Company  
500 Damonte Ranch Pkwy, Suite 657B  
Reno, NV 89521



<b>ENTERPRISE TRUST AND INVESTMENT COMPANY</b>	
<b>What We Do</b>	
<b>How does Enterprise protect my personal information?</b>	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
<b>How does Enterprise collect my personal information?</b>	We collect your personal information, for example, when you <ul style="list-style-type: none"><li>▪ Open an account or enter into an investment advisory agreement</li><li>▪ Give us your income information and your contact information</li><li>▪ Tell us about your investment or retirement portfolio</li></ul> We also collect your personal information from other companies
<b>Why can't I limit all sharing?</b>	Federal law gives you the right to limit only <ul style="list-style-type: none"><li>▪ sharing for affiliates' everyday business purposes—information about your creditworthiness</li><li>▪ affiliates from using your information to market to you</li><li>▪ sharing for non-affiliates to market to you</li></ul> State laws and individual companies may give you additional rights to limit sharing.
<b>What happens when I limit sharing for an account I hold jointly with someone else?</b>	Your choices will apply to everyone on your account—unless you tell us otherwise.
<b>Definitions</b>	
<b>Affiliates</b>	Companies related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"><li>▪ Our affiliates include financial companies with or without a common corporate identity name, such as Enterprise TC, LLC, or Lido Advisors, LLC, as well as nonfinancial companies such as Lido Consulting, Inc.</li></ul>
<b>Non-affiliates</b>	Companies not related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"><li>▪ Enterprise does not share with non-affiliates so they can market to you</li></ul>
<b>Joint marketing</b>	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. <ul style="list-style-type: none"><li>▪ Enterprise doesn't jointly market</li></ul>
<b>Other important information</b>	
Information for California, Vermont Customers: In response to applicable state law, if the mailing address provided for your account is in California or Vermont, we will automatically treat your account as if you do not want us to disclose your personal information to non-affiliated third parties for purposes of them marketing to you, except as permitted by the applicable state law.	