

FAR HILLS GROUP

PRIVACY NOTICE FOR CALIFORNIA CONSUMERS

1. INTRODUCTION

- 1.1 Far Hills Group LLC (“**FHG**”) considers your privacy and the protection of personal data to be an utmost concern and has implemented this Privacy Policy. This PRIVACY NOTICE FOR CALIFORNIA CONSUMERS (“**CCPA Policy**”) supplements the information contained in FHG’s Privacy Policy as well as any other privacy notices we may provide and applies solely to California Consumers (as the terms “personal information” and “consumer” is defined under the California Consumer Privacy Act of 2018, as amended, and implementing regulations (“**CCPA**”). Any capitalized terms or other terms not defined herein shall have the meaning ascribed to them in the CCPA. To the extent of any conflict between this CCPA Policy and the rest of our Privacy Policy, this CCPA Policy shall control only with respect to California Consumers and their personal information.
- 1.2 When you contact FHG, and when we provide any services to you, FHG may collect information that identifies, relates to, describes, references, is capable of being associated with or could reasonably be linked, directly or indirectly, with a California Consumer (“**Personal Data**”). This can include the following information relating to you: name, business contact data, email address, and correspondence records. If you are an investor in a fund marketed by FHG or a beneficial owner or control person of a legal entity investor, you may be asked for additional personal information required for regulatory and legal purposes. We may combine the Personal Data that you provide to us with Personal Data that we collect about you from third parties that provide publicly available data and other public sources. The Personal Data collected about you will help us provide you with better service and facilitate our business relationship. Please read this CCPA Policy carefully to understand our treatment and use of personal data.
- 1.3 In this CCPA Policy, references to “**you**” means the person about whom we collect, use and process personal information and not to any legal entity (such as your employer) which you may be representing.

2. WHEN DOES THIS PRIVACY NOTICE APPLY?

This Notice applies to Personal Data that we collect, use and otherwise process about you in connection with the following relationship with us:

- When contacting us online at farhills.com (the “website”), via email, via telephone, in writing or otherwise, you may provide Personal Data about yourself, including, your name and contact details (e.g. your address, email address and telephone number).
- As an investor in one or more alternative investment products marketed by Far Hills Group LLC. This may relate to you, if you are an individual, or to your individual representative and/or ultimate beneficial owner (if required).
- As a prospective investor or representative of a prospective investor in one or more of the alternative investment products we market.
- As a key employee or representative of an investment manager of an alternative investment product for which we currently or will potentially serve as the marketing agent.

3. PROCESSING OF YOUR PERSONAL DATA

- 3.1 The Personal Data we collect from you within the last twelve (12) months helps us manage our relationship with you, by allowing us to keep you informed of the investment products we are marketing and to assist in the placement of alternative investment offerings. We also collect the data to comply with our legal and regulatory obligations, as well as for the conduct of our business. The Personal Data we collect, the basis of processing and the purposes of processing are detailed below.

Category	Types of Personal data obtained	Basis and purpose of processing
Prospective Investors	Name, employer, corporate contact information, corporate email address, information on products or services purchased or considered, investment experience and knowledge.	It is necessary in order to respond to queries, provide you with, and inform you about, the investment products we market and send direct marketing communications to you.
Investors, Representatives of Investors and Beneficial Owners of Investors	Name, date of birth, address, employment information, email address, photo identification or driver's license, passport number or other identification number, income, net worth, assets, investment experience, source of funds and banking details.	It is necessary to comply with legal and regulatory obligations to which we are subject such as, investor due diligence, carrying out verification for KYC terrorist financing and AML checks, verifying the identity and addresses of investors (and, if applicable, their beneficial owners), complying with requests from regulatory, governmental, and law enforcement authorities, and maintaining records in accordance with regulatory and legal requirements and to facilitate disaster recovery.
Key Employees or Representatives of Investment Managers	Personal data, which depending on relevant laws may include name, personal address, educational background, work history and contact information, credit history, regulatory history, criminal and court system history.	It is necessary to comply with applicable legal and regulatory obligations to which we are subject such as undertaking due diligence on products that we may market to ensure that the products are suitable for investors, carry out verification, KYC and AML checks, and to comply with requests from regulatory, governmental, and law enforcement authorities. It is also necessary to provide placement services to you.

3.2 Where does FHG obtain my personal data from?

From Whom do we collect this data	Where we obtain the personal data
Personal data that you provide us	<ul style="list-style-type: none"> • Personal data obtained during the subscription process, either directly from you or through the Fund Administrator such as subscription documents and identification documents. • When you provide it to us through correspondence and conversations, through our website, via telephone, in writing or otherwise. • For key employees or representatives of Investment Manager clients, from consent forms provided, via the background check company
Personal data we obtain from others	<ul style="list-style-type: none"> • Publicly available and accessible directories and sources such as company corporate websites, LinkedIn and news alerts as well as databases that provide publicly available data for the alternative assets industry. • Governmental and competent regulatory authorities • For key employees or representatives of Investment Manager clients from the background check company

4. SHARING OF PERSONAL DATA

4.1 Service Providers and Fund Managers

We use third party service providers who provide services including compliance, IT and fraud prevention. In providing the services, your personal data will, where applicable, be processed by the service provider on our behalf.

Where it is necessary for the performance of our contract or for our internal business processes, we may share your Personal Data with our Fund Managers who reasonably need it to perform a function for you or in order for us to meet our contractual obligations to our Fund Managers.

We will check any third party that we use to ensure that they can provide sufficient guarantees regarding the confidentiality and security of personal data about you.

4.2 Disclosures to Third Parties

In certain circumstances, we share and/or are obliged to share your personal data with third parties for the purposes described below.

These third parties include:

- regulatory authorities;
- to comply with legal process;
- financial institutions;
- auditors;
- investment managers of the products we are marketing;
- external professional advisors; and
- in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings).

4.3 FHG does not sell Personal Data.

5. COOKIES

5.1 We may collect certain information about you through the use of cookies. Cookies are pieces of information, or files, placed on your device's that provide information including how and when pages on our website are accessed by users. You can find out more information about cookies and how to manage them by visiting www.allaboutcookies.org.

6. RETENTION PERIOD

6.1 We will retain your Personal Data for the period necessary to fulfill the purposes outlined in the Privacy Notice and during the period required or permitted by law or as long as it may be necessary for the exercise or defense of legal claims.

7. YOUR CCPA RIGHTS

7.1 Access

You may request access to the Personal Data that we have collected and maintain about you (along with information regarding its use and disclosure), over the past twelve (12) months, upon appropriate verification. You may only make such requests twice (2 times) per every twelve (12) months.

7.2 Deletion

You have the right to request that we delete personal information collected and maintained about you, subject to certain exceptions. Once your request is verified and we have determined that we are required to delete that information in accordance with applicable law, we will delete your Personal Data accordingly. Your request to delete your Personal Data may be denied if it is necessary for us to retain your information under one or more of the exceptions listed in the CCPA. Please note that a record of your deletion request may be kept pursuant to our legal obligations.

8. EXERCISING YOUR RIGHTS

- 8.1 We take your concerns very seriously. To exercise the access and deletion rights described above, please submit a request to us by either emailing privacy@farhills.com or by visiting our website at www.farhills.com and submitting a request for deletion through our "Contact Us Section". Please note that California Consumers have a right to not receive discriminatory treatment for the exercise of their rights under the CCPA.
- 8.2 Only you, or a person that you authorize to act on your behalf, may make a request related to your Personal Data. In the case of access and deletion, your request must be verifiable before we can fulfill such request. Verifying your request will require you to provide sufficient information for us to reasonably verify that you are the person about whom we collected Personal Data or a person authorized to act on your behalf. We will only use the Personal Data that you have provided in a verifiable request in order to verify your request.
- 8.3 In addition, California law entitles California residents who have used our services for personal, household or family purposes to request information concerning whether we have disclosed certain information about you within the past year to any third parties for the third parties' direct marketing purposes. California users who wish to request further information in compliance with this law can contact us by either emailing privacy@farhills.com or calling us at 212-840-7779.
- 8.4 We endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. We do not charge a fee to process or respond to your verifiable consumer request unless such request is excessive, repetitive, or manifestly unfounded.

9. DO NOT TRACK

- 9.1 Some web browsers incorporate a "do not track" feature that, when enabled, signals to websites and online services that you do not wish to be tracked. Because there is not yet an accepted standard for how to respond to such a do-not-track signal, we do not recognize or respond to these signals.

10. CHILDREN

- 10.1 Our website is not intended for or targeting children under the age of 16. We do not knowingly collect any Personal Data from children under 16. If we become aware that an individual submitting information is under 16, we will attempt to delete the information as soon as possible.

11. CHANGES TO THIS PRIVACY POLICY

- 11.1 We reserve the right in our sole discretion to modify or amend this Privacy Policy in any way at any time. In such event, we will post the changes to our Privacy Policy on the website by referring to the date it was revised. If you are concerned about how your Personal Data is used, please visit our website often for this and other important announcements and updates.

12. CONTACT US

- 12.1 We take your concerns very seriously. For further information or if you have any questions or queries about this CCPA Privacy Notice, please contact us by emailing privacy@farhills.com.

Last Updated: March 31, 2020