



YOUR CALIFORNIA PRIVACY RIGHTS

Ziegler Capital Management, LLC doing business as ZCM ("ZCM") is providing this notice to comply with the California Consumer Privacy Act of 2018 ("CCPA"). This notice is supplemental to ZCM's general Privacy Policy and provides additional provisions that apply only to California residents. In the event of a conflict between this notice and ZCM's general Privacy Policy, this notice shall control for California residents. Capitalized terms not defined in this notice have the meanings set forth in the CCPA.

1. Categories of Personal Information We Collect

When you visit our website ("Site") or when you communicate with us by phone, email or regular mail, we collect the following categories of Personal Information as detailed below:

- **Identifiers:** We collect contact information such as your name, e-mail address, and mailing address,
- **Internet Activity.** We collect your IP address and other information about how you use the Site when you visit our Site including information captured through the use of "cookies".

2. Sources We Use to Collect Personal Information

We collect Personal Information from the following sources:

- **From You.** We collect Personal Information that you provide directly to us, including when you communicate with us by phone, mail or e-mail.
- **From Our Website.** We collect certain Personal Information when you visit our Site.

3. Purposes for Which We Collect Personal Information.

We may use the Personal Information we collect for the following business purposes:

- **To Respond to Your Requests.** We use Personal Information to respond to your questions, comments or concerns. We may also use Personal Information as requested or consented to by you.
- **Administration.** We use Personal Information for administrative purposes, such as understanding our Site's demographics and user preferences.

- **Site Management.** We use Personal Information for Site management, such as troubleshooting problems, improving the content and functionality of our Site, statistical and other analyses of our Site, and to customize our Site to you and our users.
- **To Protect Legal Rights.** We may use Personal Information to protect our legal rights or interests, or those of other parties, including to bring a legal action against you or anyone who may be causing harm. We may also use Personal Information to seek business, financial or legal advice, and to respond to other legal requests.

4. When We Share Personal Information.

We limit with whom we share your Personal Information. We will not sell your Personal Information. We may share your Personal Information with the following persons or entities:

- **Employees and Our Parent Company.** We may share Personal Information with our employees and our parent company who have a need to know the information for our business purposes.
- **Service Providers.** We may share Personal Information with certain Service Providers. For example, we may share Personal Information with vendors to help us host and manage our Site; improve the content and functionality of our Site; perform data analysis and statistical analysis; troubleshoot problems with our Site; and support or provide the security for our Site.
- **Government Officials/Law Enforcement/Legal Proceedings.** We may cooperate with law enforcement and other governmental agencies, and may disclose Personal Information: (i) if we believe in good faith we are legally required to disclose that Personal Information, (ii) if we are advised to disclose Personal Information by our legal counsel, or (iii) when necessary to identify, contact or bring a legal action against someone who may cause or be causing harm to, or interfering with the legal rights of, ZCM or any other party.
- **Professional Advisors.** We may share Personal Information with our professional advisors, such as our attorneys, accountants, financial advisors and business advisors, in their capacity as advisors to ZCM.
- **Change in Ownership.** In the event (a) ZCM is subject to a change of control, (b) our Site changes ownership, in whole or in part, or (c) of a bankruptcy, receivership or a similar transaction, we may provide Personal Information, including as part of any due diligence process and upon transfer of the ownership or assets of our Company to a subsequent owner.
- **Other.** We may share Personal Information with Service Providers or other parties when explicitly requested by or consented to by you, or for the purposes for which you disclosed the Personal Information to us as indicated at the time and point of the disclosure (or as was obvious at the time and point of disclosure).

We Do Not “Sell” Your Personal Information

In the last 12 months, we have not Sold your Personal Information and we currently do not Sell Personal Information. You have the right to opt out of the Sale of your Personal Information by businesses subject to the CCPA.

Categories of Personal Information Collected

In the last 12 months, we collected the following categories of Personal Information. See the section above titled “Categories of Personal Information We Collect” for more detail on the type of Personal Information we collect in each category.

- Contact and Other Information Which Can Be Used to Identify You
- Information Related to Your Use of the Site

Categories of Personal Information Disclosed for a Business Purpose

In the last 12 months, we disclosed the following categories of Personal Information for our Business Purposes. See the section above titled “Categories of Personal Information We Collect” for more detail on the type of Personal Information in each category.

- Identifiers
- Information Related to Your Use of the Site

Consumer Rights under CCPA

California residents have certain rights under the CCPA, such as the right to request certain information or to request deletion of their Personal Information. Subject to certain limitations such as (a) exceptions permitted by applicable law and (b) verification of your identity, California residents may exercise the following rights with regard to their Personal Information:

Right to Request to Know. You have the right to request access any of the following which occurred in the prior 12-month period: (a) the categories of Personal Information we collected from you, (b) the categories of sources from which the Personal Information was collected, (c) the business or commercial purpose for collecting your Personal Information, (d) the categories of third parties with whom we shared your Personal Information, (e) the specific pieces of Personal Information we collected from you and (f) a list of categories of personal information we disclosed for a business purpose in the last 12 months.

Right to Request Deletion. You have a right to request that we delete Personal Information we collected from you. We will comply with such requests, and direct our service providers to do the same, subject to certain exceptions permitted by applicable law.

How to Exercise Your Rights to Request Access or Deletion. To exercise your California rights described in this Section, you may submit your request to us by contacting us at any of the following:

Email: compliance@zcm.com

Toll-Free Number: (844) 265-9675

Verifiable Consumer Request. In order to verify your request, you must provide sufficient information to allow us to verify you are the person about whom we collected Personal Information, and you must describe your request with sufficient detail to allow us to properly understand, evaluate, and respond to your request.

When we receive your request to exercise your rights under the CCPA: (a) we will acknowledge receipt of your request; (b) we will try to match the information you provide in making the request with information we already maintain about you; (c) if required to verify your identity, we may ask you to provide additional information, including personal information; (d) we will consider various factors when determining how to verify your identity, such as the sensitivity and value of the data, the risk of harm, the likelihood of fraud, etc.

We will only use Personal Information we collect during the verification process for the purpose of verifying your identity. If you maintain an account with us, we may use that account to respond to your request and/or verify your identity. If we are unable to verify your identity as required by applicable laws and regulations, we will decline to comply with your request, and let you know why.

When We Will Respond. We will try to respond to your request for access or deletion within 45 days. If we require additional time, we will inform you of the reason and extension period. Any disclosures we provide will only cover the 12-month period preceding receipt of your request. If you are seeking to receive data in electronic form, we will select a format to provide your Personal Information to you. We may charge a fee to process or respond to your request if it is excessive or repetitive.

Non-Discrimination. California residents have the right to not receive discriminatory treatment for exercising any of their rights under the CCPA.

Who May Exercise Your Rights? You may only make a request to exercise your rights on behalf of yourself. You also have a right to submit requests to exercise your rights under the CCPA through an authorized agent. If you choose to use an authorized agent, you must (a) provide signed permission to that authorized agent to submit requests on your behalf, (b) verify your identity directly with ZCM, and (c) directly confirm with ZCM that you granted permission to the authorized agent to submit the request on your behalf. For clarity, you are required to verify the identity of both yourself and the authorized agent.

We may deny a request from an authorized agent if we do not have proof that they are authorized by you to act on your behalf.

Shine The Light

If you are a California resident, you are permitted, pursuant to California Civil Code Section 1798.83, to obtain: (a) a list of all third parties that ZCM may have disclosed your Personal Information to, within the past year, for direct marketing purposes; and (b) a description of the categories of Personal Information disclosed. To obtain such information, please email your request to the contact information set forth above in the "How to Exercise Your Rights to Access or Deletion" section. Any such request must include "California Privacy Rights Request" in the first line of the description and include your name, street address, city, state, and ZIP code. Please note that we are only required to respond to one request per customer each year, and we are not required to respond to requests made by means other than through this email address or mail address.

Contact for More Information

If you have questions or concerns about our California privacy policies and practices, please contact us as follows:

ZCM
ATTN: Compliance Department
Phone: (844) 265-9675
Email: compliance@zieglercap.com

For consumers with disabilities, we have made this notice available in this downloadable format.