

General Data Protection Regulation (GDPR) Data Privacy Policy

Michael J. Liccar & Company, LLC ("Liccar, we, our or us") and its staff ("users") provide this Data Privacy Policy (the "Policy") to protect the data/information/privacy ("data") of its clients/investors/users (collectively "you, your") who are from the United Kingdom and the European Union (collectively the "EU"). This Privacy Policy applies information we collect through your use of our website and any other means by which we may collect information about you, including through our interactions with you via postal correspondence and in-person ("Services").

During our correspondence and other dealings with you, we will receive information relating to you and/or, where you act as an agent or a representative of a legal person or other entity (rather than a natural person), information relating to other officers, directors, partners, members or employees of that legal person or other entity (such information, "personal information").

Personal information is subject to certain legal safeguards specified in the General Data Protection Regulation (2016/679) ("GDPR") and any secondary and domestic legislation implementing GDPR (together, the "Data Protection Legislation"). Liccar is a 'controller' of your personal information for the purposes of the GDPR. The Data Protection Legislation prescribes the way in which we may collect, retain and handle personal information.

To ensure compliance with GDPR, in respect of the data processing to be carried out by Liccar, Liccar shall process data which shall meet the requirements of data protection rights under the GDPR, including for the security of processing.

What personal information will we process?

The types of personal information we will process relating to you may include, for example:

- name, business and/or private email address, postal address and/or telephone number, date of birth and gender;
- Social Security Number
- domicile and other geographic location data;
- bank account details, source of wealth information, accounts and bank statements, and other financial information;
- information relating to regulatory status or eligibility to make investments; and
- copies of passports, Forms W-9 or W-8, and other documentation required for identity or address verification purposes.

Personal information will never be sold to or shared with other companies or organizations for commercial purposes or as otherwise outlined in the Policy.

Where do we collect your Personal Information?

We may collect personal data through a range of means. These may include direct interactions (where you provide personal data to us through correspondence or other direct methods of communication, third-party or publicly available sources (where we receive personal data through a publicly available source such as a website or publicly-available registry).

We may require the provision of personal information if required per statute or contractual requirement. If personal information is required under these circumstances, we may not be able to provide Services if we do not collect the required personal information.

How do we use your personal information?

We will process your personal information in the normal course of our business activities, including processing pursuant to a contract to offer our services on behalf of clients, and to exercise our rights at law or under contract. We will also use your personal information, where required, to comply with our legal and regulatory obligations. This may include, without limitation, establishing investor eligibility, mitigating fraud risk factors, carrying out money laundering checks or conflict checks, and reporting to national and international regulatory and tax authorities.

With whom do we share your personal information?

We may share certain of your personal information with the following categories of third parties for the following reasons:

- Our services providers (e.g. auditors, legal counsel and tax advisers) relating to or in connection with the operation of our business, compliance with its legal, regulatory or contractual obligations with us;
- We may disclose personal information (i) if we are required to do so by law, legal process, statute, rule, regulation, or professional standard, or to respond to a subpoena, search warrant, or other government official requests, (ii) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss, (iii) in connection with an investigation of a complaint, security threat, or suspected or actual illegal activity; (iv) in connection with an internal audit; or (v) in the event that Liccar is subject to mergers, acquisitions, joint ventures, sales of assets, reorganizations, divestitures, dissolutions, bankruptcies, liquidations, or other types of business transactions. In these types of transactions, personal information may be shared, sold, or transferred, and it may be used subsequently by a third party.

They may in turn use the services of their affiliates or service providers to process your personal information where necessary or appropriate. Where we share your personal information with a third party, we generally take steps to ensure the recipients of that personal information will process it appropriately.

Your choices for processing personal information

In addition to your rights under the GDPR listed below in, we offer certain choices about how we communicate with you and what personal information we obtain about you and share with others, described below in "Your rights in relation to the personal information we process about you" section.

Information Provided by You

Depending on the activity, some of the information we ask you to provide is mandatory and some is voluntary. Whether or not to provide such information is completely your own choice. But if you choose not to provide the information we request, you may be unable to purchase products, or access certain services, offers and content on our website as a guest.

Email

You may unsubscribe from emails from us by clicking the Unsubscribe at the bottom of any promotional email from us. You may also contact us on our website (www.liccar.com) or by email (info@liccar.com) or postal address at 231 S. LaSalle Street, Suite 650, Chicago, IL 60604. Please include your current contact information and your requested changes.

Cookies

We provide a variety of services on our website using cookies. For more information regarding the use of cookies on our website, please see our Cookie Policy.

Lawful bases for processing personal information

The lawful bases for processing personal information are as follows:

Performance of a contract: to ensure our ability to perform our obligations under our administrative agreement or contracts and other documents that form the basis or our contractual relationship with you. If we cannot process personal information as required, it may not be possible for us to perform our obligations under the relevant agreement, and we may be required to terminate the agreement.

In the event Liccar goes through a business transition, such as a merger, acquisition by another company, or sale of all or a portion of its assets, the users will be notified of any such change.

Necessary for compliance with legal obligations: we are required to comply with applicable legal and regulatory requirements, including, for example, any

regulatory or tax reporting requirements; to carry out money laundering/terrorist financing checks, conflict checks, for purposes of mitigating fraud, to comply with any applicable auditing or financial reporting requirements; and to comply with information disclosure requests from regulatory, tax or other governmental or public authorities.

Protect the Vital Interests of the Data Subject: we may process your personal information to prevent, detect, investigate, mitigate, or otherwise conduct activities to protect you from fraudulent activities.

Legitimate interests, except where interests are overridden by the interests or fundamental rights and freedoms of the data subject: we may process your personal information to exercise our legitimate interests, including, but not limited to our legitimate interests to market to our current customers.

Consent: we may process your personal information for other purposes with your explicit consent.

Transfers of your personal information outside the EU

Your personal information is held by us in our office in the United States and through our hosted cloud partners, and may be shared with advisers, service providers, and disclosed to regulatory, tax or other governmental or public authorities outside the EU.

We may share your personal information with third parties, (including legal advisors and law enforcement agencies) to respond to subpoenas, investigations, court orders, legal process, or to investigate, prevent or act regarding illegal activities, suspected fraud, or as otherwise required by law.

Where we share your personal information with persons outside the EU we will, to the extent practicable, take appropriate steps to ensure your personal information is subject to safeguards in compliance with the requirements of Data Protection Legislation. We will seek to achieve this by entering into appropriate data protection addendum agreements with third party recipients of your personal information which may set out the standard contractual clauses approved by the European Commission governing the transfer of personal data outside the EU, where possible. Please contact us if you would like a copy of the standard contractual clauses.

How long is your personal information retained?

We will not retain your personal information for longer than is necessary in relation to the purposes for which your personal information is processed and in accordance with regulatory requirements. Generally, we will retain your personal information concerning your investments for [5] years after the end of any relevant contractual relationship. Personal information may be retained

for longer if it is required by law, or by a tax or regulatory authority, a law enforcement agency or other governmental or public body or considered necessary to allow us to act in accordance with a specific set of circumstances, for example, considering an actual or a potential legal action or a regulatory investigation.

Security and Storage

Liccar has industry standard security and privacy measures in place to protect the loss, misuse, breach and alteration of the personal data under our control. Liccar takes every reasonable measure to ensure that all sensitive data collected, transmitted and stored use the latest encryption methods and technologies. Liccar will take all reasonable steps to ensure the safety and privacy of the users information and data protection of the users.

Your rights in relation to the personal information we process about you

You have various rights under Data Protection Legislation in relation to the personal information relating to you. These include:

- the right to request access to your personal information;
- the right to have your personal information rectified;
- the right to withdrawal consent for processing.
- the right to have your personal information erased in certain circumstances;
- the right to request that your personal information is only used for restricted purposes; (if the lawful basis for processing your personal information is the legitimate interest of our client; the right to object to your personal information being processed, for example, for marketing purposes;
- (in some circumstances) the right to require certain of your personal information to be transferred to you or a third party; and
- the right to lodge a complaint with the relevant data regulator in your jurisdiction.

You can seek to exercise any of these rights by contacting us at info@liccar.com.

Links to Third Party Sites

Please be aware that our site may contain links to other sites hosted by third parties. We do not control, and are thus not responsible for, the content or privacy practices and policies of such other sites. We encourage our users to be aware when they leave our site and to read the privacy statements of each website that collects personally identifiable information.

Children

Minors under the age of 18 may not use the website. We do not knowingly collect personal information from anyone under the age of 18, and no part of the Website is designed to attract anyone under the age of 18. We do not sell products for purchase by children.

Breach Notification Procedure

If you become aware of an actual or potential personal data breach, please notify, immediately and without delay, to info@liccar.com.

If you are a resident of the EU and your inquiry with us has not been satisfactorily addressed, or if you believe we are processing your personal data not in accordance with the law or this Privacy Policy, you may file a complaint with the supervisory authority in your country of residence.

Questions or complaints

If you have any questions or complaints regarding the processing of your Personal information, please contact us directly at info@liccar.com.

Complaints regarding our processing of your personal information may also be made directly to the data protection regulator in your home country. In the UK this is the Information Commissioner's Office at www.ico.org.uk.

Disclaimer

All advice or recommendations made in this document is given or are made in good faith based on the information provided and otherwise generally available or know to Liccar. No advice given, or statements or recommendations made shall be in any circumstances constitute or be deemed to constitute a warranty by Liccar as to the accuracy of such advice, statements or recommendations. Liccar shall not be liable for any loss, expense, damage or claim arising out of the advice given or not given or statements made or omitted to be made in connection with this document.

This document contains confidential proprietary property and/or trade secrets of Liccar, and is not to be published, reproduced, copied, disclosed, or used without Liccar's express written consent.

This document is provided for information purposes only and is subject to change without notice and does not constitute any form of warranty, representation, or undertaking. Nothing herein should in any way be deemed to alter the legal rights and obligations contained in agreements between Liccar and or its affiliates and their clients.

COOKIE and TRACKING TECHNOLOGIES POLICY

Social Media Providers. We have presence on several social media platforms so that we can share information about our products with you and provide a forum for our community of Liccar enthusiasts to share their love for Liccar. Information collected by social media platforms when you interact with their services is governed by the social media platforms' respective privacy policies. For more information about how you can customize your privacy settings and how third-party social media websites handle your personal information, please refer to their privacy policies. You can learn more about privacy practices of each platform by clicking on "Privacy Policy" next to the platform's name below. You can also learn about their use of cookies by clicking on "Cookie Policy."

- **LinkedIn** – [Privacy Policy](#) and [Cookies Policy](#)
- **Facebook** – [Privacy Policy](#) and [Cookie Policy](#)

Cookies. We provide a variety of services on our website using cookies. We place cookies on your device to provide you with personalized access to essential services, enhance website functionality, and to show you offers and services tailored to your interests.

What is a Cookie?

A cookie is a small piece of data that a website can store on your hard drive that identifies your computer. Cookies help to navigate from page to page on a website, provide secure connections, gather statistics about the usage and effectiveness of our site, and remember preferences from a previous visit.

We use third-party services for analytics and interest-based advertising purposes. These service providers and ad partners may use cookies alone or in conjunction with unique identifiers, beacons, and other tracking technologies to collect information about you when you use our website, open our emails, or interact with our ads.

For example, we use Google Analytics to help us analyze how visitors use our websites and mobile applications. The information generated by the cookie, including your IP address, is transmitted to Google. This information is then used to evaluate visitors' use of the website and mobile applications, and to compile statistical reports on website activity for us. If you do not want any information to be collected and used by Google Analytics, you can install an [opt-out](#) in your web browser.

Analytics Providers and Advertising Networks. We allow certain analytics providers and online advertising networks and partners, such as those listed below, to set cookies during your visit to our website to collect information to provide tailored services and to personalize the ads shown to you when you visit other

websites. They may also use cookies to promote our products and offers to you on other websites based on your activity on our website. For example, you may see products that you viewed at www.liccar.com presented on other websites as you move around the internet. Some of our partners will use your location to provide more relevant messaging. We encourage you to review the privacy policies of cookie providers. Some providers also may provide opt-out options within their Privacy Policies.

Cookie Choices

Most web browsers automatically accept cookies, but you can change your browser's settings to disable all or certain cookies if you wish. For more information on how to manage browser cookies, see <http://www.allaboutcookies.org>. Click on the links below to learn how to manage cookies on these browsers:

- [Google Chrome](#)
- [Microsoft Edge](#)
- [Mozilla Firefox](#)
- [Microsoft Internet Explorer](#)
- [Opera](#)
- [Apple Safari](#)

Please note that by disabling or deleting cookies, you may not be able to access the full functionality of our website. Disabling or clearing cookies also may affect cookie-based opt-outs by either preventing you from using such cookie-based opt-outs or clearing opt-outs that you previously set.

You may control your advertising preferences or opt-out of certain Google advertising products by visiting the Google Ads Preferences Manager, currently available at <https://google.com/ads/preferences> or by visiting NAI's online resources at <http://www.networkadvertising.org/choices>.

Some of the third parties that we may work with may participate in the Digital Advertising Alliance's self-regulatory program, which provides consumers tools to opt-out of receiving interest-based advertising. Click [here](#) to learn more about the DAA's WebChoices tool. To help control or block certain ads in mobile applications, you may choose to download and utilize the DAA mobile app by clicking [here](#).

You also can learn more about opting out of third parties' use of cookies used to tailor ads and other content by visiting http://www.networkadvertising.org/managing/opt_out.asp and <http://www.aboutads.info/choices>. In the UK, go to <http://www.youronlinechoices.com/uk/opt-out-help>. In the EU, visit <http://www.youronlinechoices.eu/>.

Do Not Track

Because there currently is not an industry or legal standard for recognizing or honoring Do Not Track ("DNT") signals, we do not respond to them currently.