

Caleb Lawrence Registered Investment Adviser Inc. and Its Affiliates Privacy Notice

Effective Date: January 1, 2020

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This **Privacy Notice for California Residents** supplements the information contained in any other Privacy Statement or Notice provided by Caleb Lawrence Registered Investment Adviser inc. CLRIA and its affiliates (“**Caleb Lawrence Registered Investment Adviser inc. CLRIA**” or “**we**”) and applies solely to residents of the State of California (“**consumers**” or “**you**”). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (“**CCPA**”), as amended, and any terms defined in the CCPA have the same meaning when used in this notice.

Please note that certain exemptions apply to your rights and Caleb Lawrence Registered Investment Adviser inc. CLRIA’s obligations pursuant to the CCPA. These rights and requirements may not apply in certain situations depending on your relationship with Caleb Lawrence Registered Investment Adviser inc. CLRIA, Caleb Lawrence Registered Investment Adviser inc. CLRIA’s other legal obligations, and as otherwise provided for in the CCPA.

Caleb Lawrence Registered Investment Adviser inc. CLRIA reserves the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will post the updated notice on the Website and update the notice’s effective date. **Your continued use of our services, products, websites and/or mobile apps following the posting of changes constitutes your acceptance of such changes.**

Information We Collect

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device (“**personal information**”). In particular, we may have collected the following categories of personal information from our consumers within the last twelve (12) months:

- **Identifiers** - A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, signature or other similar identifiers.
- **Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))** - A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.
- **Protected classification characteristics under California or federal law** - Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).
- **Commercial information** - Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
- **Biometric information** - Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.
- **Internet or other similar network activity** - Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.
- **Geolocation data** - Physical location or movements.
- **Sensory data** - Audio, electronic, visual, thermal, olfactory, or similar information.
- **Professional or employment-related information** - Current or past job history or performance evaluations.
- **Inferences drawn from other personal information** - Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.
- **Household Information** - Information pertaining to household age, estimated income identifier, number of persons in household, number of cars owned, household college education, dwelling type, among other information capable of being linked to a household.

Where We Collect Your Personal Information From

We will collect the personal information described above from one or more of the below sources:

- directly from you throughout our relationship, including when you sign up for, and/or use, our products, services and websites, or when you visit our offices or attend a Caleb Lawrence Registered Investment Adviser inc. CLRIA event;
- indirectly from you, for example, from observing your actions on our websites or mobile apps;
- from our parent entities, affiliates, subsidiaries and partners;
- from third parties that are authorized to share your information with us, such as intermediaries, broker dealers, our institutional clients and service providers; and
- from publicly available sources of information.

Use of Personal Information

We may use or disclose the personal information we collect for one or more of the following business purposes:

- To fulfill or meet the reason you provided the information;
- To provide, support, personalize, and develop our websites, mobile apps products, and services;
- To create, maintain, customize, and secure your account with us;
- To process your requests, transactions, payments and prevent transactional fraud;
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses;
- To personalize your website experience and to deliver content and product and service offerings relevant to your interests, including targeted offers and ads through our websites, third-party sites, and via email or text message (with your consent, where required by law);
- To help maintain the safety, security, and integrity of our websites, software, systems, networks, products, services, databases other technology assets, and business;
- For testing, research, analysis, and product development, including to develop and improve our websites, mobile apps, products, and services;
- To manage our relationship with you or your business;
- To develop new ways to meet our clients' needs and to grow our business, for example by seeking client feedback or sharing our market research;
- To develop and carry out marketing activities in order to keep our clients informed about our products and services;
- To develop and manage our brand;
- To respond to requests by law enforcement and our regulators and as may otherwise be required by applicable law, court order, or governmental regulations;
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Caleb Lawrence Registered Investment Adviser inc. CLRIA's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by Caleb Lawrence Registered Investment Adviser inc. CLRIA is among the assets transferred; and
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.

Caleb Lawrence Registered Investment Adviser inc. CLRIA will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

Disclosures of Personal Information for a Business Purpose

In the preceding twelve (12) months, Company has disclosed the following categories of personal information for a business purpose:

- Identifiers.
- California Customer Records personal information categories.
- Protected classification characteristics under California or federal law.
- Commercial information.
- Biometric information.
- Internet or other similar network activity.
- Geolocation data.
- Sensory data.
- Professional or employment-related information.
- Inferences drawn from other personal information.
- Household Information.

We disclose your personal information for a business purpose to the following categories of third parties:

- Parent entities, affiliates and subsidiaries;
- Business partners;
- Service providers who help manage, develop, and analyze our business and/or deliver services to us and our clients. These service providers have agreed to confidentiality restrictions and use any personal information we share with them or which they collect on our behalf solely for the purpose of providing the contracted service to us;
- Agencies and organizations working to prevent fraud in financial services;
- Law enforcement, regulatory and other governmental agencies;
- Advertisers and Social Media Companies;
- Internet cookie information recipients including [Google](#), [Oracle](#), [Facebook](#), [LinkedIn](#), and [Twitter](#) (click on each respective link to see that party's privacy policy); and
- Any potential or actual third party purchasers of Caleb Lawrence Registered Investment Adviser inc. CLRIA assets where consumer information may be among those assets transferred.

No Sale of Personal Information

Caleb Lawrence Registered Investment Adviser inc. CLRIA has not sold personal information in the preceding twelve (12) months. To the extent that Caleb Lawrence Registered Investment Adviser inc. CLRIA ever changed its policy and chose to sell personal information, you would have the right to opt-out of the sale of your personal information.

Access to Specific Information Rights

You have the right, subject to certain exceptions defined in the CCPA and other applicable laws and regulations, to request that Caleb Lawrence Registered Investment Adviser inc. CLRIA disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will 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 that personal information.
- The categories of third parties with whom we share that personal information.
- The categories of personal information that each recipient received.
- The specific pieces of personal information we collected about you.

Deletion Request Rights

You have the right, subject to certain exceptions defined in the CCPA and other applicable laws and regulations, to request that Caleb Lawrence Registered Investment Adviser inc. CLRIA delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request we will delete (and direct our service providers to delete) your personal information from our records.

Exercising Access and Deletion Rights

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

- **Calling** us at 1- 831-334-5318; or
- **Emailing** us at caleb@clinvestments.com

You may only make a verifiable consumer request for access twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to verify, to a reasonably high degree of certainty, that you are the person about whom we collected personal information. This may include requesting that you provide us with at least two or more pieces of personal information to match against personal information about you that we may or may not maintain and which we have determined to be reliable for the purpose of verification.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to 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. Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Authorized Agent

Only you, or a person you have designated in writing as your authorized agent, or whom is registered with the California Secretary of State to act on your behalf, or whom you have provided power of attorney pursuant to California Probate Code sections 4000 to 4465, ("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.

If you wish to have an Authorized Agent make a verifiable consumer requests on your behalf, they will need to provide us with sufficient written proof that you have designated them as your Authorized Agent and we will still require you to provide sufficient information to allow us to reasonably verify that you are the person about whom we collected personal information.

Non-Discrimination

You have the right not to receive discriminatory treatment 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.

However, we may offer you certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your personal information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt in consent, which you may revoke at any time.

Other California Privacy Rights

Websites operated by Caleb Lawrence Registered Investment Adviser inc. CLRIA currently do not respond to "do not track" signals or similar mechanisms. California's "Shine the Light" law (Civil Code Section § 1798.83)

permits users of our Website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email to caleb@clinvestments.com.

Contact Us

Please do not hesitate to contact us if you have any questions or comments about this notice, the ways in which Caleb Lawrence Registered Investment Adviser inc. CLRIA collects and uses your personal information, your choices and rights regarding such use, wish to exercise your rights under California law or wish to receive a written copy of this notice.

Email: caleb@clinvestments.com

Phone: 831-334-5318

Website: www.clinvestments.com