

## **IEQ Client Privacy Policy**

Last Updated: March 2024

### **Information Collection**

IEQ Capital may collect personal information through submission of account documentation and contact information on forms completed by the client, or client's authorized representative. Such information could include the client's name, e-mail and postal address, phone number, Social Security number, assets, income, financial needs and goals, account balances and transactions, including those with unaffiliated third parties.

### **Information Use**

From time to time, IEQ Capital may disclose personal information collected from clients to third-party service providers that facilitate the operation of some areas of our investment advisory business, and IEQ Capital may also use such information in the account intake process, including conducting anti-money laundering screening. We require any third-party service providers to protect the confidentiality of your information and to use the information only for the purposes for which we disclose the information to them.

We use your personal information for the following purposes and as otherwise described in this Privacy Policy or at the time of collection:

- To provide, operate and improve the Site;
- To answer your inquiries;
- To provide support and maintenance;
- To respond to your requests and feedback;
- To conduct outreach programs and contact potential business leads;
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations;
- To comply with legal obligations; and
- With your consent.

### **Safeguards**

IEQ Capital uses the following measures to protect the privacy of clients. All personal information in our computers is protected from unauthorized access by a secure firewall and database architecture. In instances where personal information is exchanged via the internet, electronic and procedural methods to safeguard this exchange are used.

It is the policy of the Firm to ensure so called "consumer report information" (such as personal information about a client, e.g., Social Security number) is protected, maintained and disposed of in ways that ensure such information is safeguarded from unauthorized uses or disclosures. IEQ Capital will take reasonable measures to dispose of personal information so that it cannot be read

or reconstructed for unauthorized use. IEQ Capital will determine the appropriate method of disposal on an as needed basis.

### **Service Providers**

IEQ Capital may have relationships with non-affiliated third parties that require us to share customer information in order for the third party to carry out its services for us.

### **Processing and Servicing Transactions**

IEQ Capital may share information when it is necessary to effect, administer, or enforce a transaction for our clients or if a client initiates a request for us to share information with an outside party. All requests by clients must be received in writing from the client.

### **Sharing as Permitted or Required by Law**

IEQ Capital may disclose information to non-affiliated third parties as allowed by law. For example, this may include a disclosure in connection with a subpoena or similar legal process, a fraud investigation, recording of deeds of trust and mortgages in public records, an audit or examination, or the sale of an account to another financial institution.

### **California Consumer Privacy Act (“CCPA”)**

You may have certain rights granted to you if your personal information is protected by the California Consumer Privacy Act of 2018 (“CCPA”):

You may have the right to request that we delete any personal information that we have about you. You may call us at (650) 581-9807 or email us at [privacy@ieqcapital.com](mailto:privacy@ieqcapital.com) with “CCPA Right to Delete” in the subject line and in the body of your message to exercise this right.

You may have the right to request from us:

- the specific pieces of personal information that we have about you;
- the categories of personal information we have collected about you;
- the categories of sources from which your personal information is collected;
- the categories of your personal information that we have sold or disclosed for a business purpose about you;
- the categories of third parties to whom your personal information was sold or disclosed for a business purpose; and
- the business or commercial purpose for collecting or selling your personal information.

You may call us at (650) 581-9807 or email us at [privacy@ieqcapital.com](mailto:privacy@ieqcapital.com) with “CCPA Right to Know” in the subject line and in the body of your message to exercise this right.

There are circumstances where we are not required to comply with consumer requests and we will let you know if one of those situations arises.

We do not sell your personal information.

We reserve the right to verify your identity before we process any request relating to your personal information. We verify identify by comparing information we have on file against information you may provide us.

California residents may not be discriminated against for exercising any of the rights described above.

## Summary of Data Disclosed to Third Parties

In the preceding twelve (12) months, we may have disclosed personal information for a business purpose to the categories of third parties indicated in the chart below. We do not “sell” or “share” your information as those terms are defined in the CCPA.

Personal Information Category	Examples of Information Category	Business Purpose Disclosures	Category of Third-Party Recipients
A: Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, IP address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers	Account processing; product and services recommendations	Data Analytics Providers; Advertising Networks; Operating Systems & Platforms
B: California Customer Records personal information categories.	A name, signature, Social Security number, physical characteristics or description, address, telephone number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number. Some personal information included in this category may overlap with other categories	Account processing; product and services recommendations	Data Analytics Providers; Advertising Networks; Operating Systems & Platforms
C: 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, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information)	None	N/A
D: Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies	None	N/A
E: 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	None	N/A
F: Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement	Product and services recommendations	Advertising Networks; Data Analytics Providers; Operating Systems & Platforms
G: Geolocation data.	IP address based location information and GPS data	None	N/A
H: Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information	None	N/A
I: Professional or employment-related information.	Current or past job history or performance evaluations	Account processing; product and services recommendations	Operating Systems & Platforms
J: Non-public education information.	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records	None	N/A
K: Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes	None	N/A