

CCPA Privacy Policy

The [California Consumer Privacy Act](#) (CCPA) is effective as of January 1, 2020 and imposes certain obligations on FORT, L.P. (hereinafter “we,” “us,” “our,” or “FORT”) and grants certain rights to California residents (“California Resident,” “you” or “your”) with regard to “personal information” (defined below). If you are a California Resident, please review the following information about your potential rights with regard to your personal information under the CCPA. The rights described herein are subject to exemptions and other limitations under applicable law.

Terms used herein have the meaning ascribed to them in the CCPA. We are a “business.” “Personal information” under the CCPA means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a California resident or household. It does not include de-identified information, aggregate consumer information or publicly available information, as those terms are defined in the CCPA.

Personal Information We Collect

In the preceding 12 months, we may have collected the following categories of personal information from or about a California Resident: (i) identifiers and similar information such as, name, address, date of birth, email address, social security number, driver’s license number, passport number, online or unique identifiers like internet protocol addresses, cookies or other similar identifiers; (ii) certain information protected under federal or state laws such as a signature or bank account or other financial information; (iii) characteristics of protected classifications under federal or certain state laws, including, gender, national origin, or marital status; (iv) commercial information, including records of products or services purchased, obtained, or considered, or other purchasing histories or tendencies, including funds invested, investments considered, or sources of wealth; (v) internet or other electronic network activity information, including interactions with our website like access time, browser type; (vi) professional or employment-related information, including occupation, compensation, employer, and title; and (vii) inferences drawn from any of the information identified above to create a profile reflecting your preferences or similar information, including your potential interest in investing in new funds.

In the preceding 12 months, we may have disclosed for a business purpose all or just a few of the above categories of personal information.

Purposes for Collecting and Using Personal Information

We may collect or use your personal information for the following business or commercial purposes:

- To perform services for you (or for funds or other vehicles in which you invest), including to fulfill or meet the reason that you provided the personal information such as to verify your eligibility to participate in FORT’s financial services offerings or respond to your inquiries; to provide, support, personalize and/or develop financial products or services that meet your needs; to create, maintain, customize, and secure your account with FORT; provide customer service and to respond to your inquiries, including to investigate your concerns and monitor and improve our responses; to verify information; and to provide similar services.
- To enable or effect commercial transactions, including using bank account details to remit funds and process distributions.

- To perform contractual obligations to a California Resident, including providing updates on the performance of investments, providing tax reporting and other operational matters.
- To process your requests, subscriptions, and payments and to prevent fraudulent transactions, including to detect security incidents and protecting against malicious, deceptive, or illegal activity and preventing fraud and conducting “Know Your Client,” anti-money laundering, terrorist financing, and conflicts checks.

Sources of Personal Information

We may collect personal information about you directly from you and/or your intermediaries through sources such as: (i) account applications, subscription agreements, and other forms or related documentation; (ii) written, electronic, or verbal correspondence with us or our service providers; (iii) investor transactions; (iv) an investor’s brokerage or financial advisory firm, financial advisor, or consultant; and/or (v) from information captured on applicable websites. In addition, we may collect personal information from different sources, such as: (i) our affiliates, our service providers, or our affiliates’ service providers; (ii) public websites or other publicly accessible directories and sources, including bankruptcy registers, tax authorities, governmental agencies and departments, and regulatory authorities; and/or (iii) from credit reporting agencies, sanctions screening databases, or from sources designed to detect and prevent fraud.

Sharing of Personal Information with Third Parties

We do not sell your personal information. We may disclose personal information to third parties in circumstances where we believe in good faith that disclosure is required or permitted under law, to cooperate with regulators or law enforcement authorities, or to protect our rights or property. We also may disclose personal information about you or your accounts to a third party at your request or direction or with your consent.

We may disclose your personal information to our service providers, other entities that have agreed to limitations on the use of your personal information, or entities that fit within other exemptions or exceptions in or as otherwise permitted by the CCPA.

California Residents’ Rights under the CCPA

If your personal information is subject to the CCPA, you may have certain rights concerning that information, subject to applicable exemptions and limitations, including the right to: (i) be informed, at or before the point of collection, of the categories of personal information to be collected and the purposes for which the categories of personal information shall be used; (ii) not be discriminated against because you exercise any of your rights under the CCPA; (iii) request that we delete any personal information about you that we collect or maintain, subject to certain exceptions (“request to delete”); and (iv) request that we, as a business that collects personal information about you and that discloses your personal information for a business purpose, disclose to you (“request to know”):

- The categories of personal information we collected about you.
- The categories of sources from which we collected the personal information.
- Our business or commercial purpose for collecting the personal information.
- The categories of third parties with whom we share that personal information.

- The specific pieces of personal information we collected about you.
- The categories of personal information we have disclosed about you for a business purpose.

The CCPA does not restrict our ability to do certain things like comply with other laws or comply with regulatory investigations. In addition, the CCPA does not apply to certain information like personal information collected, processed, sold or disclosed pursuant to the federal Gramm-Leach-Bliley Act and its implementing regulations. We also reserve the right to retain, and not to delete, certain personal information after receipt of a request to delete from you where permitted by the CCPA or another law or regulation.

How to Submit a Request under the CCPA

To submit a “request to know” or a “request to delete,” as described above, please either: (a) call us at 1-888-493-3678; or (b) email us at ConsumerPrivacyRequest@fortlp.com.

We are required to provide certain information or to delete personal information only in response to verifiable requests made by you or your legally authorized agent, meaning a person registered with the California Secretary of State that you authorize to act on your behalf. Any information gathered as part of the verification process will be used for verification purposes only.

You may only make a verifiable consumer request to know twice within a 12-month period. The request must: (a) provide sufficient information to allow us to reasonably verify that you are the person about whom we collected personal information or an authorized representative; and (b) describe your request with sufficient detail to allow us to properly evaluate and respond to it.

Contact for More Information

If you have any questions or concerns about this California-specific Privacy Policy, please email us at ConsumerPrivacyRequest@fortlp.com. This notice was last updated in April 2020.