

## **CCPA Privacy Policy**

The [California Consumer Privacy Act](#) (CCPA) 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 our privacy practices surrounding how and why we collect, use, disclose and share personal information and 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.

### **Notice at Collection and Use of Personal Information**

#### *Information We Collect*

Depending on how you interact with us, we may collect certain categories of personal information from or about a California Resident, including: (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) additional information subject to Cal. Civ. Code § 1798.80(e), such as your education, credit card number, state identification card number, signature, bank account, or other financial information; (iii) characteristics of protected classifications under certain federal or 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; (vii) audio, electronic, or visual information (for example, call recordings); (viii) education information, including information that is not publicly available, personally identifiable information as defined in the Family Educational Rights and Privacy Act; and (ix) 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.

#### *How We Use Collected Information*

We may use your personal information for our business or commercial purposes, such as but not limited to:

- 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.

For more information about our privacy practices, please review our entire CCPA Privacy Policy which is available starting on the first page of this document.

## **Our Collection, Use, Disclosure, and Sharing of Personal Information**

### *Information We Have Collected*

In the preceding 12 months, and depending on how you interact with us, we may have collected the categories of personal information listed above in the “**Information We Collect**” section.

### *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 service providers and related entities; (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.

### *Purposes for Collecting Personal Information*

We may collect your personal information for the business or commercial purposes described above in the “**How We Use Collected Information**” section.

### *Our Disclosure and Sharing of Personal Information*

We do not sell your personal information. We do not knowingly sell the personal information of California Residents under 16 years old.

In the preceding 12 months, we may have disclosed for a business purpose the following categories of personal information to the following categories of third parties, as described in the following chart:

Category of Personal Information	Category of Third Party
Identifiers (for example your name, address, DOB, SSN, driver’s license, passport number and online identifiers)	<ul style="list-style-type: none"> <li>• Counterparties and intermediaries in connection with investments and transactions or for operational purposes.</li> <li>• Entities who assist with fraud prevention, detection and mitigation, including credit agencies and to assist with anti-money laundering or anti-terrorism checks.</li> <li>• Third parties as needed to complete a transaction, including financial institutions or lenders to or creditors of a fund.</li> <li>• Affiliated entities.</li> </ul>
Additional information subject to Cal. Civ. Code § 1798.80(e) (for example, a signature, state identification card number, financial information, or bank account information)	
Characteristics of protected classifications under certain federal or state laws (for example gender, age, national origin, citizenship or marital status)	<ul style="list-style-type: none"> <li>• Counterparties and intermediaries in connection with investments and transactions or for operational purposes.</li> <li>• Entities who assist with fraud prevention, detection and mitigation, including credit agencies and to assist with anti-money laundering or anti-terrorism checks.</li> <li>• Third parties as needed to complete a transaction, including financial institutions or lenders to or creditors of a fund.</li> </ul>
Commercial Information (for example records of products or services purchased, obtained or considered or purchasing histories or tendencies including funds in which you are invested, investments considered or sources of wealth)	

In addition, in the preceding 12 months, we may have disclosed for a business purpose all of the categories of personal information identified above in the section, “**Information We Collect**,” to the following categories of third parties: (i) judicial courts, regulators, or other government agents purporting to have jurisdiction over us, our subsidiaries or our affiliates, or opposing counsel and parties to litigation; and (ii) other third parties as may otherwise be permitted by law.

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. We also may disclose personal information about you or your accounts to a third party at your request or direction or with your consent.

**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) opt-out of the “sale” (as that term is defined in the CCPA) of your personal information if a business sells your personal information (we do not); (iv) request that we delete any personal information about you that we collect or maintain, subject to certain exceptions (“Request to Delete”); and (v) 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](mailto: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. When you submit a Request to Know or Request to Delete, we may ask that you provide clarifying or identifying information to verify your request. Such information may include, at a minimum, depending on the sensitivity of the information you are requesting and the type of request you are making, your name and email address. Any information gathered as part of the verification process will be used for verification purposes only.

You are permitted to designate an authorized agent to submit a Request to Know or a Request to Delete on your behalf and have that authorized agent submit the request through the aforementioned methods. In order to be able to act, authorized agents have to submit proof that they are authorized to act on your behalf, or have a power of attorney. We may also require that you directly verify your own identity with us and directly confirm with us that you provided the authorized agent permission to submit the request.

We will deliver responses to verifiable consumer requests, free of charge, by mail or electronically, at your election. We will try to respond to your Requests to Know or Request to Delete within forty-five (45) days of receipt of the request. If we require more time, we will try to inform you of our need for

an extension. Even with an extension, we will try to provide a response within ninety (90) days of initial receipt of the request. Please note that we are not required to provide information in response to Requests to Know more than twice in a 12-month period. Any response to a Request to Know will only cover the 12-month period preceding the verifiable request.

**Contact for More Information**

If you have any questions or concerns about this California-specific Privacy Policy, please email us at [ConsumerPrivacyRequest@fortlp.com](mailto:ConsumerPrivacyRequest@fortlp.com).

This notice was last updated in April 2021.