



Green Street Advisors

Privacy Policy

Companies choose how they share your personal information. Federal law gives consumers the right to limit some, but not all sharing. Federal law also requires us to tell you how we collect, share and protect your personal information. Please read this notice carefully to understand what we do.

At Green Street Advisors (“GSA”), we understand our obligation to keep information about you secure and confidential. We will inform you of our policies for collecting, using, securing, and sharing personally identifiable and/or nonpublic personal information (“Customer Information”) the first time we do business and every year that you remain a customer with us. Therefore, we maintain the following principles with respect to protecting your privacy:

- We are committed to protecting your privacy at all times;
- We do not sell or disclose any nonpublic personal information about you to anyone except as permitted by law;
- We do not provide customer information to persons or organizations outside the affiliated companies who are doing business on our behalf, for their own marketing purposes;
- We contractually require any person and/or organization providing products or services to customers on our behalf to protect the confidentiality of GSA customer information;
- We afford prospective and former customers of GSA the same protections as existing customers with respect to the use of personal information.

Information We Collect

We collect and use various types of information we believe is necessary to administer our business, and to offer you the best possible customer service. Customer information we collect is categorized into the following types:

- Information we receive from you on applications, or on other forms, through email communication, telephone or in-person interviews, such as your name, address, phone number, social security number, your assets, income and other household information;
- Information about your transactions and account experience with us or others, such as your account balance, transaction history;
- Information from consumer reporting agencies, such as information regarding your creditworthiness or credit history;
- Information from visitors to our website provided through online forms, site visitor data and online information collecting devices such as “cookies.”
- Other general information we obtain about you that is not assembled for the purpose of opening an account or offering certain products or services that you may request, such as demographic information.

- we may collect the personal information that you make available to us when you interact with us or our services through a social media platform, including your account ID or username and other information included in your posts. If you choose to log in to your account with or through a social networking service, we and that service may share certain information about you and your activities.

Users can access their contact information through their account (which we maintain) by logging in and viewing 'My Account'. You can update your information or correct any inaccuracies.

There may be times, such as when you subscribe to a trial or complimentary subscription, when we ask you to provide certain information about yourself, such as your name, shipping/billing address, telephone number, email address, credit card information, company, etc. It is your choice whether you would like to provide your personal information. If you choose not to provide certain pieces of information requested, you may not be able to purchase products, or access offers and content on our website. In addition, we may need to contact you via phone, email or mail to address questions or issues specific to your order, free or trial subscription, and contact inquiry, even if you have opted to not receive marketing communications from us.

Reasons We Share Information

The information we share helps us bring you greater convenience and more choices as a customer. We limit who receives customer information and what type of information is shared. Unless you tell us not to, we may share all five types of customer information among ourselves and with other third-party financial services companies affiliated with us as part of the ordinary course of providing financial products and services to you, for the purposes of offering you new products and services to address your financial needs, for product development purposes, and as otherwise required or permitted by law.

Such "affiliated" companies may include other financial service providers such as brokerage firms, investment adviser firms, insurance companies and payment processing companies; and may also include non-financial companies such as check printing and data processing companies. These companies might assist us, for example, in fulfilling your service request, processing your transaction, or mailing account statements. For a list of companies affiliated with GSA please see "GSA Affiliated Companies" at the end of this document.

In addition, we may share any of the five types of customer information with companies that work for us to provide marketing and other services or other financial institutions with which we have joint marketing agreements. All of these companies that are acting on our behalf, are contractually obligated to keep the information that we provide to them confidential and use the information only to provide the services we've asked them to perform.

Limitations to Sharing Customer Information

You can limit information shared about you. If you do not want us to share information from your applications, consumer reports or from other outside sources, please tell us of this request by notifying us through one of the following methods:

- **Writing to:**
Green Street Advisors
Compliance
100 Bayview Circle ~ Suite 400
Newport Beach, CA 92660

- **Calling us at:**
(949) 640 – 8780
- **Sending us an e-mail at:**
rfrancis@greenstreetadvisors.com

Please note that this request will apply to customer application information, consumer reporting agencies and/or other outside sources only and may take up to 30 days to be fully effective. Through the normal course of doing business, including servicing your accounts and better serving your financial needs, we will continue to share transaction and account experience information, as well as other general information among our affiliated companies.

Federal law gives you the right to limit only:

- Sharing for affiliates’ everyday business purposes – information about your creditworthiness;
- Affiliates from using your information to market to you;
- Sharing for non-affiliates to market to you.

State laws and individual companies may give you additional rights to limit sharing.

Disclosing information in other situations

Under certain circumstances, we may be required by law to disclose your personal information. GSA may also disclose personal information to protect its legal rights or to enforce our Customer Agreement. We may disclose certain Customer Information to credit bureaus and similar organizations, and otherwise when permitted 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;
- The sale of your account to another financial institution.

California Consumer Privacy Act (CCPA)

The act provides California consumers:

- The right to know what personal information is collected, used, shared or sold
- The right to delete personal information held by businesses
- The right to opt-out of the sale of personal information
- The right to non-discrimination
- The right to receive services on equal terms

Personal information under CCPA is information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household.

Personal information does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA's scope (ie, HIPPA, GLBA, and FIPA) – Green Street Advisors falls under the scope of the Gramm-Leach-Bliley Act - GLBA (which requires financial institutions to explain their information-sharing practices and to protect sensitive data).

California consumers have the right to make a personal information request twice in a 12-month period:

- To request how we collect and have used your personal information over the past 12 months.
- To request deletion of any personal information collected. Note, we may deny your request if retaining the information is necessary to provide contractual service, comply with legal obligations, protect against illegal activity, etc.

We will respond to a **verifiable** consumer written request within 45 days of its receipt. Send requests to:

Green Street Advisors
Compliance
100 Bayview Circle, Suite 400
Newport Beach, CA 92660

Or call toll free 888-640-8780

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 or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).

We do not disclose personal information to a third party for monetary or other valuable consideration. We do not sell customer information.

You may also download our privacy policy including our Opt-out form on our website:

www.greenstreetadvisors.com

No discrimination will be brought against you for exercising these rights, including denial of service, quality of service, or increase price of service.

Keeping up-to-date with our Privacy Policy

GSA will provide notice of our privacy policy annually, as long as you maintain an ongoing relationship with us. If, at any time in the future, it is necessary to disclose any of your nonpublic personal information in a way that is inconsistent with this policy, we will give you advance notice of the proposed change so that you may have the opportunity to opt out of such disclosure. Additionally, since this policy may change from time to time, you can always review our current policy by contacting us for a copy at: (949) 640 – 8780 or visiting our website at www.greenstreetadvisors.com.

Data Security

GSA makes Cyber Security a top priority in protecting the firm from cyber-attacks. A policy has been made by means of understanding risk, business operations, IT infrastructure and critical information for the prevention of business breaches. Industry practices are followed as it relates to IT processes and procedures for prevention and action plans.

Green Street Affiliated Companies

Affiliates to whom we may disclose personal information about you may be categorized in several different businesses, including securities and insurance. The following is a list of all companies affiliated with GSA to which this policy applies:

- Green Street Advisors (UK) Limited
- Green Street Investors, LLC
- Welsh, Carson, Anderson & Stowe

“Opt Out” Notification Form

As described in this brochure, we are committed to protecting your privacy. If you prefer that we not share certain information about you with outside companies, you may choose to opt out. This means that you may direct us at any time not to disclose this information to these outside companies for marketing purposes. Therefore, if you wish to notify us to limit such disclosures of your personal information, please indicate your choice(s) by marking the appropriate box or boxes below.

Please include your name, address, and social security number and/or tax identification number. Then detach and send this form to the address listed below so we may honor your request. If you have previously communicated an opt out choice to us, you do not have to provide it again.

Name: _____

Address: _____

City: _____ **State:** _____ **Zip Code:** _____

Social Security Number/Tax ID Number: _____

- 1. Please limit the personal information about me that you disclose to nonaffiliated third parties as described in this brochure.

If you check #1, we will not make these disclosures except as permitted by law, including disclosures necessary to process your account transactions.

- 2. Please limit the personal information about me that you share with GSA affiliates as described in this brochure.

The law allows us to share with our affiliates any information about our transactions or experiences with you. However, if you check #2, we will not share with our affiliates other information that you provide to us or that we obtain from third parties, unless otherwise permitted by law.

If you have checked any of the boxes above, please mail this form to:

Green Street Advisors
Compliance
100 Bayview Circle, Suite 400
Newport Beach, CA 92660

If you prefer, you can call us and Opt-Out at 888-640-8780.

A confirmation of receipt letter will be sent to the address listed on the Opt-Out Notification Form.