

## **PRIVACY POLICY NOTICE**

**Fairlead Strategies, LLC**  
**d/b/a: Fairlead Strategies**

Last updated on March 12, 2024.

Fairlead Strategies, LLC (together with its affiliates, "Fairlead") recognizes the importance of protecting our clients' privacy. Fairlead has policies in place to maintain the confidentiality and security of your nonpublic personal information. This Privacy Policy is designed to help you understand what information we collect from you and how we use that information.

### **Categories Of Information We May Collect**

In the normal course of business, we may collect the following types of nonpublic personal information:

- Information that you provide when you register on our website, located at <https://www.fairleadstrategies.com> (the "Website"), request certain Fairlead services or products, or enter into a subscription agreement or research consulting services agreement with us (including your name, address, e-mail address, credit card number, billing information, and other financial-related information)
- Data about your use of our products and services and your transactions with us (such as the times you log on to the Website, your usage of Fairlead's services, the reports and products accessed, and the locations from which you log on)

### **How We Use Your Information That We Collect**

Any and all nonpublic personal information received by Fairlead with respect to our clients, including the information provided by a client in an investment consulting agreement, will not be shared with nonaffiliated third parties which are not service providers to Fairlead without prior notice to such clients. In the normal course of business, we may disclose the kinds of nonpublic personal information listed above to our affiliates (including affiliated websites under common ownership or control). We may only disclose nonpublic information to nonaffiliated third party service

providers involved in servicing and administering products and services on our behalf provided the client makes an affirmative declaration, "Opt-in", allowing Fairlead to share nonpublic information with nonaffiliated third parties. Without this Opt-in provision Fairlead is prohibited from sharing nonpublic information to nonaffiliated third parties. Additionally, Fairlead may disclose such nonpublic personal information to unaffiliated third parties if we believe in good faith that such disclosure is necessary (a) to comply with the law or in response to a subpoena, court order, or other legal process, or (b) to protect the interests, rights, safety, or property of Fairlead or others. This Privacy Policy will also apply to former clients.

We gather the kinds of nonpublic personal information listed above to monitor, support, and improve services provided to our clients. This information is used to provide you with your requested service or product, to communicate with you, and to enforce any terms of service or agreement related to your use of the Website and/or our products and services. We use any credit card or payment information we acquire from you to fulfill your order.

In addition, Fairlead may use your personal information to provide you with information and special offers via various means including e-mail. You may instruct Fairlead at any time not to use your personal information covered by this Privacy Policy to provide you with special offers by emailing us. Please note that if you exercise choice in this manner, you will continue to receive communications concerning your account and products and services you requested, and in response to any requests for information by you. Please also note that this opt-out process may take some time to complete, consistent with applicable law.

## **Confidentiality and Security**

We restrict access to nonpublic personal information about our clients to those employees and agents who need to know that information in order to provide products or services to you. We maintain physical, electronic, and procedural safeguards to protect your nonpublic personal information against loss, theft, unauthorized use, disclosure, or modification. In addition, if we choose to dispose of any nonpublic personal information that we are not legally bound to maintain, then we will do so in a manner that reasonably protects such information from unauthorized access.

## **Accessing And Updating Your Personal Information**

To access, review, rectify, or delete your personal information covered by this

Privacy Policy, please contact us by emailing us at [info@fairleadstrategies.com](mailto:info@fairleadstrategies.com). While Fairlead will make reasonable efforts to accommodate your request, we also reserve the right to impose certain restrictions and requirements on such access requests, if permitted or required by applicable laws.

### **Links To Third-Party Websites**

The Website may provide links to third-party websites. Since we do not control third-party sites and are not responsible for any information you may provide while on such sites, we encourage you to read the privacy policies on those websites before providing any of your information on such sites.

### **Questions Regarding This Privacy Policy**

If you have questions regarding this Privacy Policy, please contact us by emailing us here: [info@fairleadstrategies.com](mailto:info@fairleadstrategies.com)

### **Your California Privacy Rights**

If you are a California resident, California Civil Code Section 1798.83 permits you to request information regarding the disclosure of your personal information by Fairlead to its affiliates and/or third parties for their direct marketing purposes.

To make such a request, please send an email with your first name, last name, mailing address, email address and telephone number to [info@fairleadstrategies.com](mailto:info@fairleadstrategies.com). Please include "California Privacy Rights" in the Subject line of your email.

### **Modifications To This Privacy Policy**

Fairlead reserves the right to change this Privacy Policy at any time by posting revisions on the Website. Such changes will be effective upon posting. In the event of a material change with respect to the disclosure of nonpublic personal information, we will provide written notice to you.