



## SCS CAPITAL MANAGEMENT LLC CALIFORNIA CONSUMER PRIVACY ACT PRIVACY NOTICE FOR CALIFORNIA RESIDENTS

Updated March 2025

We provide this privacy notice ("**Notice**") to comply with the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act ("**CPRA**"). This Notice applies to California residents ("**California residents**" or "**you**") who engage with us in connection with obtaining or seeking to obtain our service (collective, the "**Services**"). It supplements the privacy policies of SCS Capital Management LLC (**the "Firm," "we," or "us"**).

This Notice describes how we collect, use, and disclose information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household ("**Personal Information**"). Personal Information does not include aggregate or de-identified information or publicly-available information from government records.

## Collection of Personal Information

- **Information You Provide to Us:** We collect information you provide directly to us. For example, we collect information when you apply for or request information related to our investment advisory services, fill out a form, engage the Firm, request client assistance, or otherwise communicate with us. The types of information we may collect include your name, email address, postal address, phone number, financial account details, government--issued identifiers, and any other information you choose to provide such as employment or educationally-related details.
- **Other Information We Collect When You Use our Services:** When you access or use our Services or transact business with us, we automatically collect information about you, including:
  - **Usage Information:** We collect information about your use of the Services, such as the search terms you enter, the information and documentation you upload and/or send to us, etc.
  - **Transactional Information about our Engagement:** When you engage us, we collect information about the terms of our Services, our fees and your expectations.
  - **Log Information:** We collect information related to your access to and use of the Services, including the type of browser you use, app version, access times, pages viewed, your IP address, and the page you visited before navigating to our Services.
  - **Device Information:** We collect information about the computer or mobile device you use to access our Services, including the hardware model, operating system and version, unique device identifiers, and mobile network information.
  - **Location Information:** We may derive the approximate location of your device from your IP address.
- **Information Collected by Cookies and Similar Tracking Technologies:** We (and our service providers) use different technologies to collect information, including cookies and web beacons. Cookies are small data files stored on your hard drive or in device memory that help us improve our Services and your experience, see which areas and features of our Services are popular, and count visits. Web beacons (also known as “pixel tags” or “clear GIFs”) are electronic images that may be used in our Services or emails and help deliver cookies, count visits, and understand usage and campaign effectiveness.
- **Information We Collect from Other Sources:** We may also obtain information about you from other sources. For example, we may collect information about you from third parties, including but not limited to identity verification services, credit bureaus, and publicly available sources.
- **Information We Derive:** We may derive information or draw inferences from you based on the information we collect. For example, we may make inferences about your preferences, financial products and services that may interest you, and your investing patterns and behaviours.

## Use of Information

We use the information we collect to:

- To provide the investment advisory services you have requested;
- To protect the security and integrity of our systems, networks, applications, and data, including detecting, analyzing, and resolving security threats, and collaborating with cybersecurity centers, consortia, and law enforcement about imminent threats;
- To enforce our contracts and to protect against injury, theft, legal liability, fraud, or abuse, and to protect people or property, including physical security programs;
- To deidentify Personal Information or create aggregated datasets, such as for consolidating reporting, research, or analytics;
- For identity and credential management, including identity verification and authentication and system and technology administration;
- For fraud detection and prevention;
- For legal and regulatory compliance, including all uses and disclosures of Personal Information required by law or reasonably needed for compliance with our policies and procedures, such as: anti-money laundering programs, security and incident response programs, intellectual property protection programs, and corporate ethics and compliance hotlines;
- For corporate audit, analysis, and reporting;
- For business continuity and disaster recovery purposes;
- For corporate governance, including mergers, acquisitions, and divestitures;
- To complete transaction(s) for which the personal information was collected;
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collections;
- For testing, research, analysis and product development;
- As necessary or appropriate to protect the rights, property or safety of us, our clients or others;
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations;
- To communicate with you about products, services, news and events that may be of interest to you; and
- As described to you when collecting your personal information or as otherwise set forth in the CPRA.

## Sharing of Information

We may share information about you as follows or as otherwise described in this Notice:

- With employees, vendors, service providers, and professional advisors that perform services for you, such as custodians, third-party administrators and brokers;
- In response to a request for information if we believe disclosure is in accordance with, or required by, any applicable law or legal process, including lawful requests by public authorities to meet national security or law enforcement requirements;

- If we believe your actions are inconsistent with our user agreements or policies, if we believe you have violated the law, or to protect the rights, property, and safety of the Firm or others;
- In connection with, or during negotiations of, any merger, sale of company assets, financing or acquisition of all or a portion of our business by another company;
- Between and among the Firm, Affiliates, subsidiaries, and other companies under common control and ownership; and
- With your consent or at your direction.

We may also share aggregated or de-identified information that cannot reasonably be used by those third parties to identify you.

In the preceding twelve (12) months, we have not sold any personal information.

### **Do Not Track Signals**

Some browsers have incorporated “Do Not Track” features to enable users to make privacy and security choices. By using these settings, your browser may send a signal to our Website not to collect tracking information. Please note that we do not alter our Website’s data collection and use practices when we see a Do Not Track Signal from your browser.

### **Data Retention**

We retain your Personal Information for as long as we need to in order to carry out the purpose for which you have shared it with us or to comply with applicable law. We may retain aggregate and anonymized information indefinitely.

## **YOUR CCPA RIGHTS**

This section describes the rights provided to California residents over their personal information under the CCPA, including the right to: access/know what information we collect from you; the right to correct that information; the right to restrict our use of certain personal information; and the right to delete your personal information. The CCPA includes exceptions and exemptions that will limit your ability to exercise your CCPA rights for certain types of Personal Information.

The Firm does not sell your Personal Information. Information about how to exercise your rights is provided below. We will not discriminate against you if you exercise your rights under the CCPA.

### ***RIGHT TO ACCESS/KNOW***

Under the CCPA, you have the right to request information about the Personal Information we have collected about you during the past 12 months and what categories of Personal Information we have shared with unaffiliated third parties. Under the CCPA, you have the right to request that we disclose the following to you:

- The categories of Personal Information we collected about you.
- The specific pieces of Personal Information we collected about you.
- The categories of sources for the Personal Information we collected about you.
- The business or commercial purpose for collecting that Personal Information.
- The categories of third parties with whom we share that Personal Information.

Once we receive and confirm your verifiable access request, we will disclose the requested information covering the preceding 12 months, unless an exception applies.

### ***RIGHT TO DELETE***

Under the CCPA, you have the right to request that we delete your Personal Information. Once we receive and confirm your verifiable deletion request, we will delete or de-identify (and direct our service providers to delete or de-identify) your Personal Information from our records unless an exception applies or retaining your Personal Information is necessary for us or our service providers to:

- Comply with a legal or regulatory obligation.
- Provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.

- Detect security incidents; protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for such activities.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et seq.).
- Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

### ***RIGHT TO RESTRICT/OPT-OUT***

You can request that we restrict the use of your sensitive information (such as your financial account information and Social Security number) when there is no statutory exemption that allows us to use that information. Please note that the Firm only uses such sensitive information to provide you with the services you have requested from us.

### **HOW TO EXERCISE YOUR CCPA RIGHTS**

You may make these requests by calling 617-204-6400] or emailing [compliance@scsfinancial.com](mailto:compliance@scsfinancial.com).

### ***VERIFICATION OF CONSUMER REQUESTS***

We will verify your request by matching information you have previously provided to us to information you provide as part of your request. You have the right to request that an agent submit a request to exercise your rights on your behalf. We require that your agent provide a notarized statement from you authorizing your agent to take the requested action. We reserve the right to contact you directly if we have any questions or concerns about the agent's submission. We are not obligated to respond to more than two access requests for the same individual's personal information within a 12-month period.

Each verifiable consumer request must provide sufficient information to allow us to reasonably verify that you are the person about whom we collected Personal Information or an authorized agent. We will only request as much information as is necessary to process your request. We cannot respond to your request if we cannot verify and confirm your identity or authority to make the request.

### ***RESPONSE TIMING AND FORMAT***

We intend to respond to a verified consumer request within 45 days of our receipt. If we require additional time to respond, we will inform you of the reason for additional time needed and anticipated timing for our response. Our response will also explain why we cannot comply with your request, if applicable.

## **SHINE THE LIGHT**

California law permits residents of California to request certain details about how their information is shared with third parties for direct marketing purposes. The Firm does not share Personal Information with third parties for their direct marketing purposes.

## **CHANGES TO OUR PRIVACY POLICY**

We reserve the right to amend this privacy notice at our discretion and at any time.

## **CONTACT US**

You are encouraged to review this Notice regularly, as we may change it from time to time. If we make changes, we will notify you by revising the date at the top of the Notice and, in some cases, provide you with additional notice (such as adding a statement to our website homepage or sending you a notification).

If you have any questions about this Notice, please contact us at:

888 Boylston St, Suite 1010  
Boston, MA 02199  
[compliance@scsfinancial.com](mailto:compliance@scsfinancial.com)  
Phone: 617-204-6400  
Fax: 617-204-6411

## APPENDIX 1

### SCS Capital Management LLC Categories of Data Collected

The below table lists the categories of Personal Information the Firm may collect about its clients, including examples of information that fall within each category. For each category, we have also provided the categories of sources from which the information was collected, the purposes of collection and use, and the categories of third parties with whom we will share such data. To learn more about how the Firm uses your data and your choices, please see our CCPA Privacy Notice for California Residents.

Category of Personal Information Collected	Categories of Sources of Personal Information	Business or Commercial Purposes for Collection and Use of Personal Information	Categories of Third Parties with Whom Personal Information is Shared
<p><b>Identifiers</b>, such as:</p> <ul style="list-style-type: none"> <li>• Full name, nicknames, or previous names (such as maiden names)</li> <li>• Mailing address(es)</li> <li>• Email address(es)</li> <li>• Phone number(s)</li> <li>• Contact information for related persons, such as authorized users of your account</li> <li>• Social Security or other taxpayer identification numbers</li> <li>• Passport number</li> <li>• Client ID</li> <li>• Account number</li> </ul> <p>For security purposes, we will not disclose these identifiers in response to an access request under the CCPA.</p>	<ul style="list-style-type: none"> <li>• You</li> <li>• Other clients</li> <li>• Service Providers</li> <li>• Our and third-party cookies and other tracking technologies on our website</li> </ul>	<ul style="list-style-type: none"> <li>• Provide advisory or business management services</li> <li>• Maintain the integrity of our records</li> <li>• Security and risk management, fraud prevention, and similar purposes</li> <li>• Develop, provide and improve our products and services</li> <li>• Provide client service</li> <li>• Perform our contractual obligations</li> <li>• Maintain our ongoing business relationship</li> <li>• Create and manage your account(s)</li> <li>• Send personalized communications and notifications related to your transactions and account</li> <li>• Respond to your communications</li> <li>• Communicate with you about products, services and events that may be of interest to you</li> </ul>	<ul style="list-style-type: none"> <li>• Parent, brother-sister or subsidiaries</li> <li>• Service providers</li> <li>• Professional advisors including lawyers, auditors, consultants, and others who provide professional services to the Firm</li> <li>• Law enforcement officials and individuals involved in legal proceedings</li> <li>• U.S. Postal Service and other couriers</li> <li>• Address verification providers</li> <li>• Other third parties with your consent or at your direction</li> </ul>
<p><b>Financial Information</b>, such as:</p>	<ul style="list-style-type: none"> <li>• You</li> <li>• Payment processors and</li> </ul>	<ul style="list-style-type: none"> <li>• Maintain our business relationship with you, including processing purchases and</li> </ul>	<ul style="list-style-type: none"> <li>• Service Providers including payment processors, financial institutions, and others as needed to</li> </ul>



<ul style="list-style-type: none"> <li>• Bank account number(s) and details</li> <li>• Your account numbers at other financial institutions</li> <li>• Payroll information</li> </ul>	<ul style="list-style-type: none"> <li>• other financial institutions</li> <li>• Service providers</li> <li>• We may infer financial information about you (such as interest in certain products or services) based on your existing account status and transaction activity</li> </ul>	<ul style="list-style-type: none"> <li>• sales of securities in your accounts</li> <li>• For recordkeeping and compliance, including dispute resolution</li> <li>• For internal business purposes, such as finance, audits, training, reporting, and analytics</li> <li>• Provide advisory or other services</li> </ul>	<ul style="list-style-type: none"> <li>• complete transactions and for authentication, security, and fraud prevention</li> <li>• Professional advisors including lawyers, auditors, consultants, and others who provide professional services to the Firm</li> <li>• Other unaffiliated parties (including government agencies) as required by law</li> </ul>
<p><b>Commercial Information,</b> such as:</p> <ul style="list-style-type: none"> <li>• Client account information, transaction history, and related records (such as records of real estate purchases and sales of securities)</li> <li>• Records related to website and mobile application usage</li> <li>• Records related to business deals (such as contracts, settlements, entity formation documents and royalty statements)</li> <li>• Non-biometric data collected for client authentication (passwords, account security questions)</li> <li>• Client service records</li> </ul>	<ul style="list-style-type: none"> <li>• You</li> <li>• Other financial institutions involved in processing your transactions (for example, your bank)</li> <li>• Automatically, such as when you use our websites</li> </ul>	<ul style="list-style-type: none"> <li>• To maintain our business relationship with you, including client service</li> <li>• For recordkeeping and compliance, including dispute resolution</li> <li>• For internal business purposes, such as finance, quality control, training, reporting, and analytics</li> <li>• For risk management, fraud prevention, and similar purposes</li> <li>• Communicate with you about products, services, news and events that may be of interest to you</li> </ul>	<ul style="list-style-type: none"> <li>• Service providers as needed to complete the transaction, including mailing and delivery providers and print vendors</li> <li>• Professional advisors including lawyers, auditors, consultants, and others who provide professional services to the Firm</li> <li>• Other unaffiliated parties (including government agencies) as required by law</li> </ul>
<p><b>Internet or Electronic Network Activity Information,</b> such as:</p> <ul style="list-style-type: none"> <li>• IP address</li> <li>• Device identifiers or other persistent identifiers</li> </ul>	<ul style="list-style-type: none"> <li>• You and from your devices when you interact with our websites. For example, when you visit our websites, our server logs record your IP address and other information.</li> </ul>	<ul style="list-style-type: none"> <li>• For system administration and technology management, including optimizing our websites and applications</li> <li>• For information security and cybersecurity purposes, including detecting threats</li> <li>• For recordkeeping and reporting, including logs and records maintained</li> </ul>	<ul style="list-style-type: none"> <li>• Service providers supporting information technology and security providers, including companies such as network security services that retain information on malware threats detected</li> <li>• Service providers supporting fraud prevention, detection, and mitigation</li> <li>• Professional advisors including lawyers, auditors, consultants, and others who provide professional services to the Firm</li> </ul>

<ul style="list-style-type: none"> <li>• System identifiers including online user names or credentials</li> <li>• Advertising ID</li> <li>• Encrypted password</li> <li>• Device characteristics (such as browser information)</li> <li>• Web server logs</li> <li>• Application logs</li> <li>• Browsing data and search history</li> <li>• First-party cookies</li> <li>• Third-party cookies</li> <li>• Web beacons, clear GIFs, and pixel tags</li> </ul>	<ul style="list-style-type: none"> <li>• Automatically, via technologies such as cookies and web beacons, when you visit our websites</li> <li>• Service providers, including computer security services and advertising technology providers</li> </ul>	<p>as part of transaction and interaction information</p> <ul style="list-style-type: none"> <li>• For metrics and analytics</li> <li>• To better understand our clients and prospective clients and to enhance our relationship information, including by associating you with different devices and browsers you may use</li> <li>• For online targeting and advertising purposes</li> <li>• To track your use of our products, services, websites, and online services, including for ad delivery and personalization</li> </ul>	<ul style="list-style-type: none"> <li>• Unaffiliated network advertising providers</li> <li>• Other third parties (including government agencies) as required by law</li> </ul>
<p><b>Geolocation Data</b>, such as general geographic location (for example, city, state, and zip code)</p>	<ul style="list-style-type: none"> <li>• IP address when you use our online services</li> </ul>	<ul style="list-style-type: none"> <li>• For information security and fraud prevention</li> <li>• For our business purposes</li> </ul>	<ul style="list-style-type: none"> <li>• Service providers who assist with our information technology and security programs</li> <li>• Service providers including fraud prevention, detection, and mitigation providers</li> <li>• Professional advisors including lawyers, auditors, consultants, and others who provide professional services to the Firm</li> <li>• Other unaffiliated parties (including government agencies) as required by law</li> </ul>
<p><b>Audio, electronic, visual, thermal, olfactory, or similar information</b>, such as:</p> <ul style="list-style-type: none"> <li>• Video images</li> <li>• CCTV recordings</li> <li>• Voicemails</li> </ul>	<ul style="list-style-type: none"> <li>• You</li> <li>• Automatically, such as when we record calls to our client service center and use CCTV cameras in our facilities</li> </ul>	<ul style="list-style-type: none"> <li>• For internal business purposes, such as call recordings used for training, coaching, or quality control</li> <li>• For premises security purposes and loss prevention</li> </ul>	<ul style="list-style-type: none"> <li>• Service providers who assist with our information technology and security programs and with our loss prevention programs</li> <li>• Professional advisors including lawyers, auditors, consultants, and others who provide professional services to the Firm</li> <li>• Other unaffiliated parties (including government agencies) as required by law</li> </ul>
<p><b>Inferences</b>, such as:</p> <ul style="list-style-type: none"> <li>• Inferences drawn about you from your Personal Information, such as your preferences, financial products and services that may interest you, and your</li> </ul>	<ul style="list-style-type: none"> <li>• We create inferred and derived information by analyzing our relationship and transactional information</li> <li>• We also obtain inferred and derived information from third-party data</li> </ul>	<ul style="list-style-type: none"> <li>• To better understand you and to understand our clients generally</li> <li>• To design products, services, and programs that may be of interest to our clients</li> <li>• To identify prospective clients</li> <li>• For internal business purposes, such as quality control, training, and</li> </ul>	<ul style="list-style-type: none"> <li>• Professional advisors including lawyers, auditors, consultants, and others who provide professional services to the Firm</li> <li>• Other unaffiliated parties (including government agencies) as required by law</li> </ul>

<p>investing patterns and behaviors</p> <ul style="list-style-type: none"> <li>Propensities, attributes, and/or scores generated by internal analytics programs and used for information security and fraud prevention purposes, product and service development and improvement, and marketing</li> </ul>	<p>suppliers—companies that collect demographic and other consumer information to help with firms' marketing and customer service activities</p>	<p>analytics</p>	
<p><b>Professional, educational, or employment-related information</b>, such as job title, employer name and industry, date of hire, educational information such as your transcript</p>	<ul style="list-style-type: none"> <li>You</li> <li>Your employer(s)</li> <li>Your education provider(s)</li> <li>Service providers that help us understand our clients, including data aggregators and public records providers</li> </ul>	<ul style="list-style-type: none"> <li>To establish and maintain our business relationship with you, including processing purchases and sales of securities in your accounts</li> <li>For recordkeeping and compliance</li> </ul>	<ul style="list-style-type: none"> <li>Professional advisors including lawyers, auditors, consultants, and others who provide professional services to the Firm</li> <li>Other third parties (including government agencies) as required by law</li> </ul>
<p><b>Other information that relates to or is reasonably capable of being associated with you</b>, such as:</p> <ul style="list-style-type: none"> <li>Child's name, date of birth, address, Social Security number or other taxpayer identification number, educational information (if account assets are used to pay education expenses directly to an educational institution)</li> <li>Personal characteristics and preferences, such as your age, marital and family status, and</li> </ul>	<ul style="list-style-type: none"> <li>We do not collect Personal Information directly from children under 16. We receive limited Personal Information about children from clients (parents and other adults) only as required to establish and maintain accounts for the children's benefit</li> <li>Service providers that help us understand our clients, including data aggregators and public records providers</li> <li>We may also infer information about you based on information you have given us and on your</li> </ul>	<ul style="list-style-type: none"> <li>To provide the information, products, or services requested by the child's parent or other authorized adult</li> <li>To better understand you and to understand our clients generally</li> <li>To design products, services, and programs that may be of interest to our clients</li> <li>To identify prospective clients</li> <li>For internal business purposes, such as quality control, training, and analytics</li> </ul>	<ul style="list-style-type: none"> <li>Professional advisors including lawyers, auditors, consultants, and others who provide professional services to the Firm</li> <li>Other third parties (including government agencies) as required by law</li> </ul>

<ul style="list-style-type: none"> <li>languages spoken</li> <li>Household demographic data, including from real estate records and census data</li> <li>Hobbies and interests</li> </ul>	<p>past interactions with us and other companies. See Inferred and derived information above</p>		
<p><b>Characteristics of Protected Classifications Under California or US Law</b>, such as age, marital and family status</p>	<ul style="list-style-type: none"> <li>You</li> <li>Other clients</li> <li>Service Providers</li> </ul>	<ul style="list-style-type: none"> <li>Provide advisory or business management services</li> <li>Maintain the integrity of our records</li> <li>For internal business purposes, such as quality control, training, and analytics</li> <li>For recordkeeping and compliance</li> </ul>	<ul style="list-style-type: none"> <li>Parent, brother-sister or subsidiaries</li> <li>Service providers</li> <li>Professional advisors including lawyers, auditors, consultants, and others who provide professional services to the Firm</li> <li>Law enforcement officials and individuals involved in legal proceedings</li> </ul>