



# PRIVACY POLICY

JUNE 2020

## Who we are

Our website address is: <https://lidoadvisors.com>

## What personal data we collect and why we collect it

### Comments

When visitors leave comments on the site we collect the data shown in the comments form, and also the visitor's IP address and browser user agent string to help spam detection.

An anonymized string created from your email address (also called a hash) may be provided to the Gravatar service to see if you are using it. The Gravatar service privacy policy is available here: <https://automattic.com/privacy/>. After approval of your comment, your profile picture is visible to the public in the context of your comment.

### Media

If you upload images to the website, you should avoid uploading images with embedded location data (EXIF GPS) included. Visitors to the website can download and extract any location data from images on the website.

### Cookies

If you leave a comment on our site you may opt-in to save your name, email address and website in cookies. These are for your convenience so that you do not have to fill in your details again when you leave another comment. These cookies will last for one year.

If you have an account and you log in to this site, we will set a temporary cookie to determine if your browser accepts cookies. This cookie

contains no personal data and is discarded when you close your browser.

When you log in, we will also set up several cookies to save your login information and your screen display choices. Login cookies last for two days, and screen options cookies last for a year. If you select "Remember Me", your login will persist for two weeks. If you log out of your account, the login cookies will be removed.

If you edit or publish an article, an additional cookie will be saved in your browser. This cookie includes no personal data and simply indicates the post ID of the article you just edited. It expires after 1 day.

### Embedded content from other websites

Articles on this site may include embedded content (e.g. videos, images, articles, etc.). Embedded content from other websites behaves in the exact same way as if the visitor has visited the other website.

These websites may collect data about you, use cookies, embed additional third-party tracking, and monitor your interaction with that embedded content, including tracing your interaction with the embedded content if you have an account and are logged in to that website.

## How long we retain your data

If you leave a comment, the comment and its metadata are retained indefinitely. This is so we can recognize and approve any follow-up comments automatically instead of holding them in a moderation queue.

For users that register on our website (if any), we also store the personal information they provide

in their user profile. All users can see, edit, or delete their personal information at any time (except they cannot change their username). Website administrators can also see and edit that information.

## What rights you have over your data

If you have an account on this site, or have left comments, you can request to receive an exported file of the personal data we hold about you, including any data you have provided to us. You can also request that we erase any personal data we hold about you. This does not include any data we are obliged to keep for administrative, legal, or security purposes.

## Where we send your data

Visitor comments may be checked through an automated spam detection service.

## California-Specific Privacy Policy

### The California Consumer Privacy Act

California enacted the California Consumer Privacy Act ("CCPA") in 2018, and it is effective as of January 1, 2020. The CCPA imposes certain obligations on the Fund and the General Partner (together, "we" or "us") and grants certain rights to California residents ("California Resident," "you" or "your") with regard to "personal information." 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. The Fund and the General Partner 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 a household. It does not include deidentified information, aggregate consumer information or publicly available information, as those terms are defined in the CCPA.

## Purposes for Collecting and Using Personal Information

We may collect or use your personal information for the following business or commercial purposes: (i) performing services on behalf of a fund, including maintaining or servicing accounts, providing investor relations services, processing subscriptions, and withdrawals, verifying information, processing payments or providing similar services; (ii) performing our contractual obligations to a California Resident as a subscriber to a fund, including providing updates on a fund's performance, providing tax reporting and other operational matters; (iii) detecting security incidents and protecting against malicious, deceptive, fraudulent, or illegal activity, including preventing fraud and conducting "Know Your Client," anti-money laundering, terrorist financing, and conflict checks; and (iv) enabling or effecting commercial transactions, including, using bank account details to remit funds and process distributions.

## 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 identifiers 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 or use of certain online tools; (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 prior 12 months, we may have disclosed for a business purpose all or just a few of the above categories of personal information.

### 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 capture 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 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, to protect our rights or property, or upon reasonable request by the fund in which you have invested. 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 collected or maintained, 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”): (a) the categories of personal information we have collected about you; (b) the categories of sources from which we have collected the personal information; (c) the business or commercial purpose for collecting the personal information; (d) the categories of third parties with which we share personal information; (e) the specific pieces of personal information we have collected about you; and (f) 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

You may submit a “request to know,” as described above, through the following toll-free telephone number **(310) 278-8232**, or email us at **[compliance@lidoadvisors.com](mailto:compliance@lidoadvisors.com)**. You may submit a “request to delete” through the aforementioned toll-free number or email address.

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. Any information gathered as part of the verification process will be used for verification purposes only.

# FACTS

## WHAT DOES LIDO ADVISORS, LLC DO WITH YOUR PERSONAL INFORMATION?

<b>Why?</b>	Financial 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.
<b>What?</b>	<p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> <li>■ Social Security number and income</li> <li>■ Assets and account balances</li> <li>■ Investment experience and risk tolerance</li> </ul> <p>When you are <i>no longer</i> our client, we continue to share your information as described in this notice.</p>
<b>How?</b>	All financial companies need to share clients' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their clients' personal information; the reasons Lido chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Lido share?	Can you limit this sharing?
<b>For our everyday business purposes—</b> such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
<b>For our marketing purposes—</b> to offer our products and services to you	Yes	No
<b>For joint marketing with other financial companies</b>	No	We don't share
<b>For our affiliates' everyday business purposes—</b> information about your transactions and experiences	Yes	No
<b>For our affiliates' everyday business purposes—</b> information about your creditworthiness	No	We don't share
<b>For our affiliates to market to you</b>	Yes	Yes
<b>For non-affiliates to market to you</b>	No	We don't share

<b>To limit our sharing</b>	<ul style="list-style-type: none"> <li>■ Mail the <b>form</b> below</li> </ul> <p><b>Please note:</b></p> <p>If you are a <i>new</i> client, we can begin sharing your information thirty (30) days from the date we sent this notice. When you are <i>no longer</i> our client, we continue to share your information as described in this notice.</p> <p>However, you can contact us at any time to limit our sharing.</p>
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<b>Questions?</b>	Call (310) 278-8232 or go to <a href="http://www.lidoadvisors.com">www.lidoadvisors.com</a>
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### Mail-in Form

<p><b>If you have a joint account, your choice(s) will apply to everyone on your account unless you mark below</b></p> <p><input type="checkbox"/> <b>Apply my choices only to me</b></p>	<p>Mark if you want to limit:</p> <p><input type="checkbox"/> Do not allow your affiliates to use my personal information to market to me.</p>	
	Name	
	Address	
	City, State, Zip	
	Account #	
		<p><b>Mail to:</b></p> <p>Lido Advisors, LLC 1875 Century Park East, Suite 950, Los Angeles, CA 90067</p>

### What we do

<b>How does Lido protect my personal information?</b>	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
<b>How does Lido collect my personal information?</b>	We collect your personal information, for example, when you <ul style="list-style-type: none"> <li>■ Open an account or enter into an investment advisory agreement</li> <li>■ Give us your income information and your contact information</li> <li>■ Tell us about your investment or retirement portfolio</li> </ul> We also collect your personal information from other companies
<b>Why can't I limit all sharing?</b>	Federal law gives you the right to limit only <ul style="list-style-type: none"> <li>■ sharing for affiliates' everyday business purposes—information about your creditworthiness</li> <li>■ affiliates from using your information to market to you</li> <li>■ sharing for non-affiliates to market to you</li> </ul> State laws and individual companies may give you additional rights to limit sharing.
<b>What happens when I limit sharing for an account I hold jointly with someone else?</b>	Your choices will apply to everyone on your account—unless you tell us otherwise.

### Definitions

<b>Affiliates</b>	Companies related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> <li>■ <i>Our affiliates include companies with a common corporate identity name; nonfinancial companies such as Lido Consulting, Inc. Also affiliates with uncommon corporate identity names: financial companies such as Oakhurst Advisors, LLC</i></li> </ul>
<b>Non-affiliates</b>	Companies not related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> <li>■ <i>Lido does not share with non-affiliates so they can market to you</i></li> </ul>
<b>Joint marketing</b>	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. <ul style="list-style-type: none"> <li>■ <i>Lido doesn't jointly market</i></li> </ul>

### Other important information

Information for California, Vermont Customers: In response to applicable state law, if the mailing address provided for your account is in California or Vermont, we will automatically treat your account as if you do not want us to disclose your personal information to non-affiliated third parties for purposes of them marketing to you, except as permitted by the applicable state law.