



CRESSET®

Cresset Capital Management, LLC  
Cresset Asset Management, LLC  
Cresset Partners, LLC

## PRIVACY POLICY

March 26, 2021

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Cresset Capital Management, LLC, along with its affiliates hereinafter collectively referred to as (“Cresset”) does not rent, sell or trade your personal information to anyone. Cresset Asset Management, LLC, also conducting business as PagnatoKarp, provides investment advisory, family office, and other services to individuals, families, and institutional clients. Cresset Partners, LLC, provides investment advisory services strictly to investment vehicles investing in private equity, real estate and other investment opportunities. Cresset Asset Management, LLC, and Cresset Partners, LLC, are SEC registered investment advisors. This Privacy Policy describes how Cresset collects, uses, and shares your personal information when you contact us and when we provide services to you. Any visitor of the Cresset websites (the “Website” or “Websites”) shall be considered a “User.”

## **COLLECTING INFORMATION**

Cresset may collect, store and use personally identifiable information (“Information”) about you in the course of servicing you as a Client or as a User of our Websites. Cresset may also record information about browsing activity, data reviewed, and other information related to your use of our Websites. Cresset may use cookies or other tracking technology to record this and similar information about your activity on our Websites. As a User of our Websites, you agree to accept the terms of this Privacy Policy, otherwise you are not an authorized user of our Websites and Cresset may choose not to do business with you or provide you services.

## **USE OF INFORMATION**

Cresset stores, processes, and maintains Information and data related to you in order to provide you support and offer you services.

Cresset may use “cookies” or similar files or scripts throughout the Website to enhance your convenience in using the Website, to improve search functionality or to hold information that you would otherwise need to re-key. “Cookies” are text files collected by a user’s web browser. If you do not wish to accept “cookies” from the Website, you may configure your web browser so that it does not accept “cookies”; however, you may lose certain functions available on the Website.

## **INFORMATION AND THIRD PARTIES**

Cresset does not disclose Information to non-affiliated third parties, except as described in this Privacy Policy or as permitted by law. Cresset may provide Information:

- To complete transactions or account changes as directed by you
- If requested by you or at your consent/authorization
- With contracted third parties, administrators and vendors used by Cresset to effect, administer, develop, support and/or provide services to our Clients
- As required by applicable or regulatory authorities with jurisdiction over Cresset
- In circumstances where Cresset reasonably believes it is necessary to investigate, prevent or react to illegal activities, suspected fraud, threatening situations, or violations of our terms and conditions of use

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Cresset does not provide your Information to mailing list vendors or solicitors or share such Information with non-affiliates for marketing purposes. Cresset does not engage in joint marketing with non-affiliates, although Cresset may refer you to other service providers and provide your Information to them on your authorization. Our policy is to only use vendors and service providers whom we believe have adequate privacy and security policies of their own.

Federal law gives you the right to limit sharing for Cresset affiliates everyday business purposes related to your creditworthiness, Cresset affiliates to market to you, and for non-affiliates to market to you. State laws may also give clients additional rights to limit sharing.

## **USER OPTIONS**

You may request that we delete any Information by contacting us in writing at [info@cressetcapital.com](mailto:info@cressetcapital.com).

We will ask you to verify your identity and will attempt to make any deletion request effective as soon as is commercially possible. However, we will retain Information connected to your account in accordance with applicable laws. You may decline to provide certain Information to Cresset, but such declination may disqualify you from using the Website and/or Cresset from providing you services.

You may set your browser (if supported) to opt-out from online behavioral tracking by enabling Do Not Track ("DNT"). Cresset does not track its customers over time and across third-party websites to provide targeted advertising and therefore Cresset does not respond to DNT signals.

## **SECURITY**

Cresset takes reasonable steps to protect your Information from loss, misuse and unauthorized access, alteration, disclosure, or destruction in accordance with applicable law. No Internet, e-mail or electronic operating system is ever fully secure or error free, so please take care in deciding what information you give to us.

Cresset takes steps to reasonably ensure that the privacy of your Information remains secure even in the event of the disposal of Information that is no longer required to be maintained. Such steps shall include whenever possible, shredding paper documents and records prior to disposal, requiring off-site storage vendors to shred documents maintained in such locations prior to disposal, and erasing and/or obliterating any data contained on electronic media in such a manner that the Information can no longer be read or reconstructed.

## **PHISHING SCAMS**

Cresset does not send emails to users or customers requesting billing, login, user ID or password information. If you receive an email purporting to be from Cresset that asks you to provide personal or account information, or login and passwords, do not provide such information unless you have first verified that the website or email is from Cresset. Such emails may be fraudulent and used in connection with scams known as phishing. Cresset asks that you report any suspicious emails or websites to Cresset.

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## THIRD PARTY WEBSITES

We may provide links to access other websites that are not operated or controlled by Cresset. These policies herein do not apply to any third-party websites

## CHANGES

We may alter this Privacy Policy from time to time. If we do, we will post an updated Privacy Policy to our Website(s) with the effective date of the new policy, and we will also provide Clients with the modified Privacy Policy if the changes materially alter the previous Privacy Policy. Each User is responsible for regularly reviewing this Privacy Policy for any changes. Your continued use of our Websites constitutes consent to all such changes.

## YOUR ROLE

Your participation is an important component of all our safety efforts. We believe it is essential that we work in close cooperation with you as our Client to maintain the highest levels of security. Below are some helpful websites to learn ways to help protect your information.

- [Federal Trade Commission - Privacy, Identity & Online Security](#)[Federal Trade Commission - Scams](#)[Federal Trade Commission - Identity Theft Recovery & Your Rights](#)
- [Identity Theft Resource Center](#)
- [Social Security Fraud Prevention & Reporting](#)
- [United States Postal Inspection Service](#)

## CONTACT

We will always provide contact information on our websites. Please contact us at [info@cressetcapital.com](mailto:info@cressetcapital.com) at any time with any questions about this Privacy Policy or the related terms herein.

## EFFECTIVE DATE

This Privacy Policy is effective as of March 26, 2021.