

# LONGBOARD

## Privacy Policy

(Last Update: 08/22/2017)

## Notice to Clients

Longboard Asset Management, LP (“Longboard”, “We”, “Our”, “Us”) respects your right to keep your personal information confidential. The following information is intended to provide you (“You”, “Your”) with a better understanding of our Privacy Policy with respect to your personal information:

### Information We Have About You

We receive information about You to help us serve Your financial needs, offer You investment advisory services, and to fulfill contractual, legal and regulatory requirements. This information is received from a variety of sources, including:

- Information You provide directly to us, such as Your name, physical address, email address, phone number, social security number, employment information, investment experience, bank account information, assets, liabilities and income.
- Information about Your relationship with us, such as account information including account numbers, account balances and payment history.
- Information we receive with Your authorization from third parties, such as financial institutions, companies, and other individuals.

### Protection and Use of Information

To protect Your private information, we maintain physical, electronic and procedural safeguards to guard Your personal information including restricting Your personal information to our employees that need to know that information in order to service Your account. Our Privacy Policy, which applies to all employees, restricts the use of client information and requires that it be held in strict confidence. In fact, we require each new employee sign a confidentiality agreement. Employees who violate our Privacy Policy are subject to disciplinary action.

We use the information acquired to provide professional investment advisory services to You, respond to inquiries about the Longboard family of products and services, communicate with You about our products and services, process investment requests, share with Your investment information and tools, perform marketing- and research-related activities, and to make available other administrative services (i.e., respond to requests for information). We take reasonable steps to keep confidential the information acquired. Where appropriate, information provided by us to employees, affiliates, and nonaffiliated third parties who perform services for us, is subject to contractual agreement which prohibit these parties from disclosing or using the

information other than for the purposes for which the information was disclosed.

### Parties to Whom We Disclose Information

We do not sell personal information about current or former clients or their accounts to third parties. Nor do we share personal information about clients or prospective clients, except when needed to complete transactions at Your request or to make You aware of financial products and services that we offer. Personal information may be disclosed as permitted by law, as follows: to complete certain transactions or account changes that You direct, it may be necessary to provide identifying information about You to companies, individuals, or groups that are not affiliated with Longboard. For example, if You ask to transfer assets from another financial institution to Longboard, we will need to provide certain information about You to that company to complete the transaction; as necessary to properly maintain and service such client’s account; providing information to affiliates and nonaffiliated third parties, such as attorneys, accountants and auditors who perform services or functions for us pursuant to a contractual agreement which prohibits the affiliate or the nonaffiliated third party from disclosing or using the information other than for the purposes for which the information was disclosed; to alert You to other financial products and services that Longboard offers or sponsors. This would include, for example, sharing Your information within Longboard to make You aware of new Longboard funds or other investment offerings, the asset management and services offered through Longboard’s registered investment. In complying with Federal, State or local laws, rules and other applicable legal requirements; in complying with a properly authorized civil, criminal, or regulatory investigation or subpoena or summons by Federal, state, or local authorities; in responding to judicial process or government regulatory authorities having jurisdiction over us for examination, compliance and other purposes as authorized by law; or we will release information about You if You direct or authorize us to do so, if we are compelled by law to do so, or in other legally limited circumstances (for example, to prevent fraud).

### Links to Other Websites

Longboard may provide links to one or more other websites. We encourage You to read their individual privacy policies before providing any of Your personal information to them.

## Use of Cookies, Web Beacons, and Third-Party Analytics

Our website uses a variety of technologies, such as cookies, web beacons, and similar mechanisms to collect information that helps us understand how our site is used. Specifically, when You visit our website, we or our third-party service providers may automatically collect a variety of technical and navigational information about You via these technologies, including: Your computer or device type; operating system version; browser type and version; user agent string; internet connection type; mobile network provider; date and time of Your visit; time since Your last visit; webpages You view; links You click; searches conducted on the site; the internet protocol (IP) address used to access our site; Your general geographic location (e.g., Your city, state, or ZIP code); and the website visited before our site. We also may use similar tracking technologies in emails that we or third parties send to You. This information may be used, for example, to alert You to software compatibility issues or to resolve technical or service problems. We also analyze this information, with the assistance of our service providers, to improve our web design and functionality, to enhance our ability to serve You and Your accounts, and to tailor our communications to You regarding our products and services.

## What About Children's Privacy?

Longboard does not separately identify or collect any information that is specific to children.

## Your Consent

By using this website or subscribing to our communications, You consent to the collection and use of any personal information and any related information in the manner described in this Privacy Policy. Please note that Longboard's systems are not currently configured to accommodate "do not track" requests.

## Updating Your Information

In our communications, we include detailed unsubscribe/opt-out instructions as appropriate. It is much more efficient if You utilize the 'unsubscribe' link in the communication. However, if You need further assistance with unsubscribing or opting-out of any communications, email [Support@Longboardfunds.com](mailto:Support@Longboardfunds.com) for assistance. Upon request, and to the extent practicable and allowed by law, we will make reasonable efforts to remove Your information from our databases. However, be aware we may be unable to remove Your information from the records of any third party who

has received your information in accordance with this Privacy Policy.

At our discretion, we may determine that Your lack of engagement indicates your desire to opt-out of receiving our communications. For example, you may be removed from our email list if you have not opened an email from us for a certain period of time. You may opt-in again at any time.

## California Residents

Under California Law SB 27, California residents are afforded expanded rights to information about shared personal information, or are required to have the free ability to opt-in or opt-out of such sharing. This Privacy Policy fully affords You the rights not to have Your personal information shared by us. If You have any questions about Your ability to opt-out of information sharing by us, please use the methods described in this Privacy Policy.

## Data Security

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect Your Personal Information, we cannot guarantee the security of Your Personal Information transmitted to our website. Any transmission of Personal Information is at Your own risk.

## Changes in Corporate Structure

In developing our business, we might sell certain assets, or the company, or parts of it, may be sold, merged or otherwise transferred. In such transactions, user information, whether personally identifiable or otherwise, may be one of the transferred assets.

## Changes to the Privacy Policy

Longboard reserves the right to change this policy at any time by distributing and/or posting a new Privacy Policy without notice. We encourage You to review our Privacy Policy on a regular basis so that You will be aware of any changes to it.

**If you have further questions about our privacy practices, please send an email to [Support@Longboardfunds.com](mailto:Support@Longboardfunds.com)**