



## PART 1: CONSUMER PRIVACY POLICY (REG S-P)

### Overview

#### **Why?**

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.

#### **What?**

The types of personal information we collect and share depend on the product or service you have with us. This information can include: Social Security number and employment information, bank account information, investment account information, and investment experience.

#### **How?**

All financial companies need to share customers' personal information to run their everyday business. In the sections below, we list the reasons financial companies can share their customers' personal information; the reasons we choose to share; and whether you can limit this sharing.

### Handling of Information

#### **Reasons We May Share Your Information**

We share your personal information only for the following two purposes: (1) for our everyday business purposes, such as to process your transactions, maintain your account(s), respond to court orders and legal investigation, or report to credit bureaus and (2) for our marketing purposes, to offer our products and services to you.

#### **Reasons We Do Not Share Your Information**

We do not share your information for joint marketing with other financial companies or with any affiliates or non-affiliates.

#### **Limiting the Sharing of Information**

Federal law gives you the right to limit only sharing for affiliates' everyday business purposes – information about your creditworthiness, affiliates from using your information to market you, sharing for nonaffiliates to market you. State laws and individual companies may give you additional rights to limit sharing.

#### **Protecting Your Information**

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.

#### **Collecting Your Information**

We collect your personal information, for example, when you register to become a Graystream client, access and use our services, or otherwise provide us your personal information.

### Definitions

*Affiliates* are defined as companies related by common ownership or control. They can be financial and nonfinancial companies. *Nonaffiliates* are defined as companies not related by common ownership or control. They can be financial and nonfinancial companies. *Joint marketing* is defined as a formal agreement between nonaffiliated financial companies that together market financial products or services to you.

### Contact Information

Please direct any questions you have regarding this privacy notice to [connect@graystream.com](mailto:connect@graystream.com).



## PART 2: ONLINE PRIVACY POLICY

### Overview

This Online Privacy Policy, along with the terms of the Consumer Privacy Policy set forth above, (collectively, the “Privacy Policy”) applies to all websites and web-based or mobile applications linking to or posting this Privacy Policy (collectively the “Platform”) that are operated by Graystream LLC dba Graystream Capital (“Graystream”, “we”, “us”, or “our”). This Privacy Policy describes how we use, store, disclose, and process information that we obtain about you through our Platform, including information that we obtain outside the Platform (such as via email) during the course of offering you our investment advisory services (collectively the “Service”). Please read this information carefully before accessing any of our Platform or using our Service. By accessing our Platform, or by setting up an account with us or using our Service, you agree to the terms of this Privacy Policy.

### Information Collected

#### **Onboarding Information**

When you register to use the Service through our Platform, you must establish a user ID and password, as well as provide us with certain personal information, including, but not limited to, your legal first and last name, email address, mailing address, phone number, date of birth, citizenship status, passport/driver’s license number, and social security number. You may also be asked to provide similar information to us from time to time as you use the Service and/or access any of our Platform.

#### **Financial Information**

When you register to use the Service through our Platform, you will be asked to provide information regarding your financial status including an estimate of your annual income, an estimate of your liquid net worth, as well as the source of any funds you will be contributing to the Platform.

#### **Investment Information**

When you register to use the Service through our Platform, you will be asked to provide information regarding your investment preferences, including your risk tolerance, investment objectives and experience, and time horizon.

#### **Banking Information**

To transfer funds from your bank account using our Platform, you will be asked to provide information regarding your banking relationship, including the bank name, the routing number, and your account number.

#### **Access Information**

When you use the Service or otherwise access our Platform, we may record certain details about your computer or mobile phone, the name of your Internet Service Provider (ISP), your IP Address, the website from which you visit us, the pages on the Platform that you visit and in what sequence, the date and length of your visit and other statistical information about your visit to the Platform.

### Information Usage

#### **Reasons We May Use Your Information**

- to provide the Service to you, and to conduct our other everyday business purposes (including to process your transactions and maintain your account with us);
- to inform you of changes made to the Service or the Platform;
- to provide customer care and support;
- to respond to questions that you may have about the Service or the Platform, or about our firm;
- to understand general customer trends and patterns so we can develop and support existing and ongoing marketing strategies for our products and services; and
- for security, administrative, or legal purposes



## **Sharing of Information**

We will not disclose to any third-party information collected about you through any of our Platforms, except as described in this Privacy Policy. Specifically, we may disclose to third-parties information collected about you either (1) when we have your permission, or (2) in any of the following situations without your permission:

We may disclose information collected about you to third-party service providers or other partners who perform services on our behalf in connection with the Service or the Platform, including without limitation in connection with our service provider or partner completing or confirming a transaction that you conduct with us. When we transfer personally identifiable information about you to such a service provider or partner, that entity will be contractually required to use such information only to carry out those services that we have requested and to provide adequate protection for such information. We may also share information collected about you with our auditors, attorneys, and similar advisors in connection with our receiving their professional services, subject to standard confidentiality obligations. We may disclose information about you to the government or to third parties under certain circumstances when legally obligated to do so, such as in connection with suspected illegal activity in connection with the Service or the Platform, or to respond to a subpoena, court order or other legal process. We reserve the right to release such information to law enforcement or other government officials, as we, in our sole discretion, deem necessary or appropriate. We may also disclose information about you to third parties if needed to enforce any of our Terms of Use; to conduct any investigation of potential violations thereof; to detect, prevent, or otherwise address fraud, security or technical issues; to protect the rights, property or safety of Graystream or others; or to protect against harm to any element of the Platform.

## **How Long We Maintain Your Information**

We will retain information about you collected through any of our Platforms for at least as long as it serves the purposes for which it was initially collected or subsequently authorized, and we may keep such information indefinitely.

## **Information Security**

To help protect the privacy of information collected through the Platforms, we employ reasonable technical, physical, and organizational measures intended to protect such information against accidental or intentional manipulation, loss, misuse, or destruction, and against unauthorized disclosure or access, as well as to protect such information, both during transmission and once it is received, including encrypting the transmission of any sensitive information (such as bank account information or payment card information).

NOTWITHSTANDING THE FOREGOING, PLEASE NOTE THAT DESPITE OUR BEST INTENTIONS NO TECHNOLOGY IS COMPLETELY SECURE. PLEASE BE AWARE THAT OUR PLATFORMS ARE OPERATED ON SOFTWARE, HARDWARE AND NETWORKS, ANY COMPONENT OF WHICH MAY, FROM TIME TO TIME, EXPERIENCE BREACHES OF SECURITY OR OTHER PROBLEMS BEYOND OUR CONTROL.

Accordingly we cannot guarantee that any information obtained about you through the Platform, whether during transmission or while stored on our systems or otherwise in our care, will be absolutely safe from intrusion by others who do not have your authorization. Any such transmission or sharing of that information is done at your own risk. You also play a role in protecting your personal information. Please do not share your user ID or password with others. If we receive an order or instructions using your information, we will consider that you have authorized the transaction.

## **Third-Party Links**

The Platform may contain links to other websites that are not covered by this Privacy Policy and where information practices may be different from ours. You should consult any external site's privacy policies before submitting any of your personal information to such third parties, as we are not responsible for and have no control over information that is submitted to, or collected by, these third-party sites.



## **Children's Privacy**

We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your child has provided us with personal information, please contact us. If we become aware that we have collected personal information from a child without verification of parental consent, we will take the appropriate actions to remove that information from our database.

## **Policy Amendments**

We reserve the right to update or modify this Privacy Policy from time to time, with any such changes to be effective immediately. Please visit our website ([www.graystreamcapital.com/legal](http://www.graystreamcapital.com/legal)) periodically and review our legal documents so that you are aware of any revisions. Your continued use of any of the Service and/or our Platform after any amendment to this Privacy Policy will constitute your acceptance of such modification.

## **Governing Laws**

You agree that any dispute over privacy or the terms contained in this Privacy Policy will be governed by the law of the State of Tennessee, without reference to the choice of law or conflicts of law principles thereof, and will be subject to the dispute resolution clause contained in our Terms of Use found on our website ([www.graystreamcapital.com/legal](http://www.graystreamcapital.com/legal)). If any provision of this Privacy Policy is judged to be illegal, void or unenforceable due to applicable law or by order of a court of competent jurisdiction it shall be deemed deleted and the continuation in full force and effect of the remainder of the provisions will not be prejudiced.

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