## **Evoke Advisors Client Privacy Policy**

#### **Information Collection**

Evoke Advisors may collect personal information through submission of account documentation and contact information on forms completed by the client, or client's authorized representative. Such information could include the client's name, e-mail and postal address, phone number, Social Security number, assets, income, financial needs and goals, account balances and transactions, including those with unaffiliated third parties.

#### **Information Use**

From time to time, Evoke Advisors may disclose personal information collected from clients as may be required to service your account to third-party service providers that facilitate the operation of some areas of our investment advisory business, and Evoke Advisors may also use such information in the account intake process, including conducting anti-money laundering screening. We require any third-party service providers to protect the confidentiality of your information and to use the information only for the purposes for which we disclose the information to them. We do not share or sell personal information to affiliated or unaffiliated third parties for the purpose of marketing or promotion.

We may sell, transfer or otherwise share some or all of our business or assets, including your personal information, in connection with a business transaction (or potential business transaction) such as a corporate divestiture, merger, consolidation, acquisition, reorganization or sale of assets, or in the event of bankruptcy or dissolution.

We use your personal information for the following purposes and as otherwise described in this Privacy Policy or at the time of collection:

- To provide, operate and improve our services and our website;
- To answer your inquiries;
- To provide support and maintenance;
- To respond to your requests and feedback;
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations;
- To comply with legal obligations; and
- With your consent.

# Safeguards

Evoke Advisors uses the following measures to protect the privacy of clients. All personal information in our computers is protected from unauthorized access by a secure firewall and database architecture. In instances where personal information is exchanged via the internet, electronic and procedural methods to safeguard this exchange are used.

It is the policy of Evoke Advisors to ensure so called "consumer report information" (such as personal information about a client, e.g., Social Security number) is protected, maintained and

disposed of in ways that ensure such information is safeguarded from unauthorized uses or disclosures. Evoke Advisors will take reasonable measures to dispose of personal information so that it cannot be read or reconstructed for unauthorized use. Evoke Advisors will determine the appropriate method of disposal on an as needed basis.

#### **Service Providers**

Evoke Advisors may have relationships with non-affiliated third parties that require us to share customer information in order for the third party to carry out its services for us.

## **Processing and Servicing Transactions**

Evoke Advisors may share information when it is necessary to effect, administer, or enforce a transaction for our clients or if a client initiates a request for us to share information with an outside party. All requests by clients must be received in writing from the client.

# Sharing as Permitted or Required by Law

Evoke Advisors may disclose information to non-affiliated third parties as allowed by law. For example, this may include a disclosure in connection with a subpoena or similar legal process, a fraud investigation, recording of deeds of trust and mortgages in public records, an audit or examination, or the sale of an account to another financial institution.

## **Cookies & Similar Technologies**

We use cookies and related technologies ("Cookies") to provide services, gather information when users navigate through our website to enhance and personalize the experience, to understand usage patterns, and to improve our Sites, products, and Services.

Types of Cookies: We use both session Cookies (which expire once you close your web browser) and persistent Cookies (which stay on your device until you delete them). To make it easier for you to understand why we need them, the Cookies we use on our Site can be grouped into the following categories:

- **Strictly Necessary:** These Cookies are necessary for the Site to work properly. They include any essential authentication and authorization Cookies for our Site.
- Functionality: These Cookies enable technical performance and allow us to remember the choices you make while browsing our Site, including any preferences you set. They also include sign-in and authentication Cookies and IDs that enable you to return without additional sign-in.
- **Performance/Analytical:** These Cookies allow us to collect certain information about how you navigate the Site and services running on your device. They help us understand which areas you use and what we can do to improve them.
- Advertising: These record your visit to our Sites, the pages you have visited and the links
  you have followed to recognize you as a previous visitor and to track your activity on the
  Sites. These Cookies qualify as persistent cookies, because they remain on your device for
  us to use during a next visit to our Sites. You can delete these cookies via your browser
  settings.

How to Control and Delete Cookies: Cookies can be controlled, blocked or restricted through your web browser settings. Information on how to do this can be found within the Help section of your browser. All Cookies are browse-specific. Therefore, if you use multiple browsers or devices to access websites, you will need to manage your Cookie preferences across these environments.

Find out how to manage Cookies on popular browsers:

- Google Chrome, available at https://support.google.com/accounts/answer/61416?co=GENIE.Platform%3DDesktop&hl= en
- o Microsoft Edge, available at https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy
- Mozilla Firefox, available at https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences
- o Microsoft Internet Explorer, available at https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies
- Opera, available at https://www.opera.com/help/tutorials/security/privacy/
- o Apple Safari, available at https://support.apple.com/guide/safari/manage-cookies-sfri11471/mac

If you are using a mobile device to access the Site, you will need to refer to your instruction manual or other help/settings resource to find out how you can control Cookies on your device. For more information about Cookies, and how to disable Cookies, visit <a href="http://www.allaboutcookies.org">http://www.allaboutcookies.org</a>.

Please note that if you restrict, disable or block any or all Cookies from your web browser or mobile or other device, the Site may not operate properly, and you may not have access to our services available through the Site. We are not responsible for your inability to use our Site or any degraded function you may experience that may be caused by your settings and choices regarding Cookies.

### California Consumer Privacy Act ("CCPA")

You may have certain rights granted to you if your personal information is protected by the California Consumer Privacy Act of 2018 ("CCPA"):

You may have the right to request that we delete any personal information that we have about you. You may call us at (424) 372-1776 or email us at <a href="mailto:bwaters@evokeadvisors.com">bwaters@evokeadvisors.com</a> with "CCPA Right to Delete" in the subject line and in the body of your message to exercise this right.

You may have the right to request from us:

- the specific pieces of personal information that we have about you;
- the categories of personal information we have collected about you;
- the categories of sources from which your personal information is collected;
- the categories of your personal information that we have sold or disclosed for a business purpose about you;
- the categories of third parties to whom your personal information was sold or disclosed for a business purpose; and

• the business or commercial purpose for collecting or selling your personal information.

You may call us at (424) 372-1776 or email us at bwaters@evokeadvisors.com with "CCPA Right to Know" in the subject line and in the body of your message to exercise this right.

There are circumstances where we are not required to comply with consumer requests and we will let you know if one of those situations arises.

We do not sell your personal information.

We reserve the right to verify your identity before we process any request relating to your personal information. We verify identify by comparing information we have on file against information you may provide us.

California residents may not be discriminated against for exercising any of the rights described above.

#### **Privacy Technology Practices**

- Do Not Track: Some Internet browsers may be configured to send "Do Not Track" signals to the online services that you visit. We currently do not respond to "Do Not Track" or similar signals. To find out more about "Do Not Track," please visit <a href="http://www.allaboutdnt.com">http://www.allaboutdnt.com</a>.
- Links to Third-Party Sites: The Site may contain links to other websites, mobile applications, and other online services operated by third parties. These links are not an endorsement of, or representation that we are affiliated with, any third party. In addition, our content may be included on web pages or in mobile applications or online services that are not associated with us. We do not control third party websites, mobile applications or online services, and we are not responsible for their actions. Other websites, mobile applications and services follow different rules regarding the collection, use and sharing of your personal information. We encourage you to read the privacy policies of the other websites, mobile applications and online services you use.
- Data Security: The security of your personal information is important to us. We employ a number of administrative, technical, and physical safeguards designed to protect the personal information we collect. The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Site, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. We urge you to be careful about giving out information in public areas of the Site. 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 data transmitted to our Site. Any transmission of personal information is at your own risk.

#### Additional Disclosures for California Residents

This section outlines data privacy rights afforded to California residents and certain disclosures that are required by the California Consumer Privacy Act, as amended by the California Privacy

# Rights Act (CCPA).

- Your Right to Know and Delete: You have the right to request that we disclose certain information to you about our collection and use of your personal data over the past 12 months. Once we receive and validate your request, we will include a list of your personal data that may have been disclosed and the categories of third parties the information may have been disclosed to. You may request that we delete any of your personal data that we collected from you and retained, subject to certain exceptions. Once we receive your request and confirm your identity, we will review your request. We may deny your deletion request if retaining the information is proper and necessary or if an exception allowing us to retain the information applies under applicable law. If your request is approved, we will delete or deidentify the relevant information and will direct our service providers to take similar action.
- Exercising Your Rights to Know, Delete or Correct: To exercise your rights to know or delete described above, please submit a request by emailing us at <a href="mailto:compliance@evokeadvisors.com">compliance@evokeadvisors.com</a>. Only you, or your authorized representative may make a request to know or delete related to your personal data. We may ask for your name, email address and account information to verify your identity or your authorized representative's identity. You may only submit a request to know twice within a 12-month period. We endeavor to substantively respond to a verifiable consumer request within forty-five (45) days of its receipt, unless we require an extension. If we reasonably require an extension, we will inform you of the reason and extension period.
- Non-Discrimination: We will not discriminate against you for exercising any of your data rights. We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.
- California's Shine the Light Law: California Civil Code Section 1798.83 permits users of our Site that are California residents to request certain information regarding our disclosure of the information you provide through the website to third parties for their direct marketing purposes. To make such a request, please contact us at the information provided above.

#### **Summary of Data Disclosed to Third Parties**

In the preceding twelve (12) months, we may have disclosed personal information for a business purpose to the categories of third parties indicated in the chart below. We do not "sell" or "share" your information as those terms are defined in the CCPA.

PERSONAL INFORMATON CATEGORY	EXAMPLES OF INFORMATION CATEGORY	BUSINESS PURPOSE DISCLOSURES	CATEGORY OF THIRD- PARTY RECIPIENTS
A: Identifiers	A real name, alias, postal address, unique personal identifier, online idenfier, IP address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers	Only as required by law, or to properly open, service, and/or maintain your account in the normal course of business	Service providers with whom we have an ongoing business relationship. Applicable regulatory authorities
B: California Customer Records personal information categories	A name, signature, Social Security numer, physical characteristics or description, address, telephone number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number. Some personal information in this category may overlap with other categories	Only as required by law, or to properly open, service, and/or maintain your account in the normal course of business	Service providers with whom we have an ongoing business relationship. Applicable regulatory authorities
C: Protected classification characteristics under California or federal law	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, pregnance or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information)	None	N/A
D: Commercial information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies	None	N/A
E: Biometric information	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints	None	N/A
F: Internal or other similar network activity	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement	None	N/A
G: Geolocation data	IP accress based location information and GPS data	None	N/A
H: Sensory data	Audio, electronic, visual, thermal, olfactory, or similar information	None	N/A
I: Professional or employment- related informaiton	Current or past job history or performance evaluations	Only as required by law	Applicable regulatory authorities
J: Non-public education information	Edcuation records directly related to a student maintained by an educational instituion or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records	None	N/A
K: Inferences drawn from other personal information	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities and aptitudes	None	N/A