



European Union General Data Protection Regulation Privacy Notice

This Privacy Notice describes how Apriem Advisors treats personal data of individuals in the European Economic Area (EEA). The information in this Notice is provided pursuant to the European Union's General Data Protection Regulation (GDPR).

Data Collected and Basis for Processing Data

We collect and process your personal data when processing is necessary for the performance of our services with you or your designee. We may collect the following kinds of confidential personal information about you: information we receive from you on applications or other forms, such as your name, address, phone number, social security number, occupation, assets, income and other financial and family information.

We also process your personal data in order to comply with applicable U.S. laws. Basis for such processing are our legitimate interests, as we could not provide you with the required services unless we complied with U.S. laws.

Personal Data not Obtained from You

We collect information about your transactions with us or with brokerages, banks and custodians with whom you hold investment or cash accounts. This information includes account numbers, holdings, balances, transaction history and other financial and investment activities.

Sharing of Data with Third Parties

When it comes to sharing customer information with unaffiliated companies, we place strict limits on who receives specific information about customer accounts and other personally identifiable data. We do not share customer information with any non-affiliated third party except: when necessary to complete a transaction in the account, such as with the clearing firm or account custodians; when required to maintain or service the account; to resolve customer disputes; when requested by a fiduciary or beneficiary on the account; to our attorneys, accountants or compliance advisors; when required by a regulatory agency, or for other reasons required or permitted by law; in connection with a sale or merger of our business; or in any circumstance that has your instruction or consent. We share the minimum amount of information necessary for that company to provide its product or service.

International Transfers of Your Personal Data

Our offices are based in the U.S. The European Commission has not made an “adequacy decision” with respect to the data protection laws of the U.S. We transfer data to our offices in the U.S. as necessary for the performance of our agreement with you. We recognize that a fundamental element of maintaining effective customer privacy procedures is to provide reasonable protection against the unauthorized access to customer information. Therefore, we have established appropriate security standards and procedures to guard against any unauthorized access to customer information.

Data Storage Period

We process and store personal data for as long as is required to provide services. We also retain your personal data for such time as is necessary to comply with our regulatory and legal obligations and with corporate standards.

Your GDPR Rights

You can exercise or address these rights (subject to retention and other requirements under applicable law) by contacting our Chief Compliance Officer at +1-949-253-8888 or compliance@apriem.com

- 1. Access.** You have the right to obtain access to your personal data.
- 2. Rectification.** You have the right to ask for incorrect, inaccurate, or incomplete personal data to be corrected.
- 3. Erasure.** You have the right to request that personal data be erased.
- 4. Restriction of processing.** You have the right to request the restriction of the processing of your personal data in specific cases.
- 5. Objection to processing.** You have the right to object to the processing of your personal data for marketing purposes or on grounds relating to your particular situation.
- 6. Portability.** You have the right to receive your personal data in a machine-readable format.
- 7. Lodging a complaint.** You have the right to lodge a complaint with a Supervisory Authority.