

PRIVACY POLICY

Effective **May ??, 2021**

WELCOME!

This is the Privacy Policy (“**Policy**”) of Class VI Partners, LLC and its subsidiaries and affiliates (collectively “**Class VI**”, “**us**”, “**our**”, or “**we**”). This Privacy Policy describes how we collect, use, disclose, and process your Personal Data (as defined below) and your choices and rights with respect to how we process that Personal Data. Please read this policy carefully.

SCOPE

This Policy applies to our “**Services**” which include our website at www.classvippartners.com, including any subdomains or mobile versions (our “**Site**”), our proprietary software and platform known as CoPilot ([including its website www.copilotanalytics.com](http://www.copilotanalytics.com)), and other services we may provide to you (e.g. investment banking, wealth management, [business consulting](#), or other services). Please note that some of our Services are subject to additional privacy notices that may be required by law, and our clients who have entered into an engagement agreement with us (“**Clients**”) may receive those additional privacy notices in connection with those Services. In addition to allowing individuals to browse our Site (“**Users**”), our Services allow our Clients to use the Services, and in some cases to designate others who are authorized to access the Services (“**Authorized Users**”).

This Policy does not apply to information processed by third parties, for example, when you visit a third-party website or interact with third-party services, unless those parties collect or process information on our behalf. Please review any relevant third-party privacy policies for more information.

COLLECTION AND USE OF PERSONAL DATA

Personal Data We Collect

In order to provide our Services, we may collect and process information that relates to identified or identifiable individuals (“**Personal Data**”). We collect and process the following categories of Personal Data (note, specific Personal Data elements are examples and may change):

<i>Identity Data:</i>	Personal Data about you and your identity, such as your name, username, profile data, and other Personal Data you may provide when you register for our Services or as part of a user or account profile.
<i>Contact Data:</i>	Personal Data used to contact an individual, e.g. email address or phone number.
<i>Biographical Data:</i>	Personal Data relating to employment/employer, professional qualifications or affiliations, experience, etc.
<i>Commercial Data:</i>	Personal Data relating to your use of the Service, including your engagements or other transactions with us.
<i>Device/Network Data:</i>	Personal Data relating to your device, browser, or application e.g. IP address, MAC address, application ID/AdID/IDFA, identifiers from cookies, session history and similar browsing metadata, and other data generated through applications and browsers, including via cookies and similar technologies.
<i>Financial Data:</i>	Personal Data related to your financial accounts or potentially your income or assets, depending on the specific Services you have requested that we provide to you.
<i>User Content:</i>	Personal Data included in content provided by users of the Service in a free-form or unstructured format, such as in a “contact us” box, free text field, in answers provided within CoPilot, in a file, document, or in messages.

How We Collect Personal Data

We collect Personal Data from various sources based on the context in which the Personal Data will be used:

<i>Your:</i>	We collect Personal Data from you directly, for example, when you input information into an online form, register for our Services, or provide Personal Data to our employees so that they can provide certain Services to you.
<i>Your Devices:</i>	We may collect certain Personal Data automatically from your devices. For example, we collect Device/Network Data automatically using cookies and similar technologies when you use our Services, access our Sites, or when you open our marketing communications.
<i>Service Providers:</i>	We receive Personal Data from third parties with whom we have a relationship, such as third parties who perform background checks for us, or others who may collect information on our behalf.
<i>Data we create or infer:</i>	We may create and infer Personal Data based on our observations or analysis of other Personal Data we process, and we may correlate this data with other data we process about you.

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How We Process Personal Data

We process Personal Data in a variety of contexts for certain purposes, as well as for the specific business purposes described below.

Client Services and Registration

If you become a Client of Class VI we will collect and process Identity Data, Contact Data, Biographical Data, and Financial Data in order to create your account and provide our Services to you. The specific Personal Data will vary depending on the Services you have requested. For example, if your Services will involve online access, we will process your login credentials for that portion of our Services.

Using the Services

We generally process Identity Data, Contact Data, Biographical Data, Commercial Data, and Device/Network Data when you use our Services and when you complete forms [or provide data otherwise](#) in order to provide information we need for the Services. We generally use this as necessary to create your profile, and in order to maintain and provide the Services/features you request. For example, we may use this information to [log you in](#), authenticate your access, and provide you with access to certain online Services, or to analyze your circumstances in order to provide investment banking, [consulting](#), or family office services. We process, analyze and share Identity Data, Contact Data, Biographical Data, Device/Network Data, and User Content in order to provide our Services.

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Billing and Payment

We may collect Financial Data, Identity Data, Commercial Data and Contact Data in connection with billing and payment for our Services. We primarily use this information as necessary to process the billing and payment transaction, or to contact you regarding a transaction.

Marketing Communications

We may process Identity Data, Biographical Data, Device/Network Data and Contact Data in connection with email marketing communications, which you might receive [if you register for an account](#), request materials available from our Site, sign up for our blog, [elect to use our CoPilot application](#), choose to receive marketing communications, become our Client or an Authorized User, or engage in a transaction allowing us to send you those marketing communications. We may also automatically collect Device/Network Data when you open or interact with those marketing communications.

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Contact Us

When you contact us through the Site using a contact us box, or via email, we process Personal Data such as Identity Data, Device/Network Data, and any Personal Data contained within any User Content. We use Identity Data, Contact Data, and User Content as necessary to communicate with you about the subject matter of your request and related matters. We may use third party service providers who provide these services and collect data on our behalf.

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Cookies and Similar Tracking Technologies

We, and certain third parties, automatically collect and process Identity Data, Contact Data, and Device/Network Data when you interact with cookies and similar technologies on our Services. We may receive this data from third parties to the extent allowed by the applicable partner. Please note that the privacy policies of third parties may also apply to these technologies and the Personal Data collected through them.

Subject to your rights & choices, we may use this information as follows:

- (i) for “essential” or “functional” purposes, such as to enable certain features of the Services, or keeping you logged in during your session;
- (ii) for “analytics” and “personalization” purposes, consistent with our business interest in how the Services are used or perform, how users engage with and navigate through our Services, what sites users visit before visiting our Site, and other similar information, and understand characteristics of Users in various technical and geographic contexts; and
- (iii) for “retargeting” or similar advertising purposes, so that you can see advertisements from us on other websites. These technologies and the data they collect may be used by advertisers to deliver ads that are more relevant to you based on content you have viewed, including content on our Sites. These tracking technologies may also help prevent you from seeing the same advertisements too many times and help us understand whether you have interacted with or viewed ads we’ve delivered to you. This data collection may take place both on our Sites, as well as on third-party websites that participate in the ad network (e.g. including as part of advertisements delivered by that ad network on a third-party website).

Note: Some of these technologies can be used to identify you across platforms, devices, sites, and services. Our Site currently does not respond to browser-based do not track requests.

Business Purposes of Processing

In addition to the processing described above, we generally process Personal Data for several common purposes in connection with our business. For example, we process your Personal Data:

To Provide our Services and Fulfill Obligations

We process any Personal Data as is necessary to provide the Services and otherwise fulfill our obligations to you, e.g. to provide you with information you request.

Internal Processes and Service Improvement

We may use Personal Data in connection with our improvement of the design of our Services, understanding how our Services are used or function, for customer service purposes, in connection with the creation and analysis of logs and metadata relating to our Services, for ensuring the security and stability of the Services, and to understand how our Services perform, or we may analyze use of the Services to determine if there are specific activities that might indicate an information security risk to the Services or our Users.

Aggregate Analytics

We process Personal Data in connection with our creation of aggregate analytics relating to how our Services are used, company, industry, and investment trends, and to create other reports regarding the use of our Services, demographics of our users, and other similar information and metrics. The resulting aggregate data will not contain information from which an individual may be readily identified.

Compliance, Health, Safety & Public Interest

Note that we may, without your consent or further notice to you, and to the extent required or permitted by law, process any Personal Data subject to this Policy for purposes determined to be in the public interest or otherwise required by law. For example, we may process information as necessary to fulfil our legal obligations, to protect the vital interests of any individuals, or otherwise in the public interest or as required by a public authority. Please see the data sharing section for more information about how we disclose Personal Data in extraordinary circumstances.

Other Processing of Personal Data

If we process Personal Data in connection with our Services in a way not described in this Policy, this Policy will still apply generally (e.g. with respect to users' rights and choices) unless otherwise stated when you provide it.

DATA SHARING

Information we collect may be shared with a variety of parties, depending upon the purpose for and context in which that information was provided. We generally transfer data as described below.

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Service Providers

We may share Personal Data with service providers who provide certain services or process data on our behalf. For example, we may disclose information to vendors such as cloud-hosting providers, software providers, payment processors, and providers of other utilities or functions.

Investment Banking

If you have engaged us in connection with investment banking services or to help you facilitate a corporate transaction, we may share certain Personal Data with third parties who may be interested in investing in, merging with or purchasing your company.

Corporate Events

Your Personal Data may be shared in the event that we go through a business transition, such as a merger, acquisition, liquidation, or sale of all or a portion of our assets. For example, Personal Data may be part of the assets transferred, or may be disclosed (subject to confidentiality restrictions) during the due diligence process for a potential transaction.

Affiliates

In order to streamline certain business operations and develop products and services that better meet the interests and needs of our customers, and for other permitted purposes, we may share your Personal Data with any of our current or future affiliated entities, subsidiaries, and parent companies.

Legal Disclosures

In limited circumstances, we may, without notice or your consent, access and disclose your Personal Data, any communications sent or received by you, and any other information that we may have about you to the extent we believe such disclosure is legally required, to prevent or respond to a crime, to investigate violations of our Terms of Use or a customer agreement, or in the vital interests of us or any person. We may, in our sole discretion (but without any obligation), object to the disclosure of your Personal Data to such parties.

YOUR RIGHTS AND CHOICES

Your Rights

Applicable law may grant you certain rights in your Personal Data. These rights vary based on your state/country of residence, and may be limited by or subject to our exemptions from certain laws. California residents may request a list of Personal Data we have disclosed about you to third parties for direct marketing purposes (if any) during the preceding calendar year.

You may submit requests to exercise rights you have by contacting us at info@classvipartners.com. All rights requests must be verified to ensure that the individual making the request is authorized to make that request, to reduce fraud, and to ensure the security of your Personal Data.

Your Choices

You may have the following choices regarding the Personal Data we process, to the extent required under applicable law:

Consent: If you consent to processing, you may withdraw your consent at any time. You may be required to close your account in order to withdraw consent where your consent is necessary to perform essential aspects of our Services.

Direct Marketing: You have the choice to opt-out of or withdraw your consent to marketing communications. You may exercise your choice via the links in our communications or by contacting us.

Cookies & Similar Tech: Although we do not feature advertising within our Services, you may opt out or withdraw your consent to online advertising. You must opt out of certain third-party services directly via the third party. For example, to opt out of Google's use of cookies, visit Google's Ads Settings, [here](#). If you wish to take steps to opt-out of tracking by certain online advertisers, you can visit the Digital Advertising Alliance's opt-out page at <http://www.aboutads.info/choices> or the Network Advertising Initiative at www.networkadvertising.org/optout_nonppii.asp.

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SECURITY

We implement and maintain reasonable security measures to safeguard the Personal Data you provide us. However, we sometimes share Personal Data with third parties as noted above, and though we may enter contracts to help ensure security, we do control third parties' security processes. We do not warrant perfect security and we do not provide any guarantee that your Personal Data or any other information you provide us will remain secure.

DATA RETENTION

We retain information for so long as it, in our discretion, remains relevant to its authorized processing purpose, and in any event, for so long as required by law.

CHANGES TO OUR POLICY

We may change this Policy from time to time. Please visit this page regularly so that you are aware of our latest updates. Your use of the Services following notice of any changes indicates acceptance of any changes.

CONTACT US

Feel free to contact us with questions or concerns:

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