

INTERNET SECURITY

This website and client Document Portal are operated by Colony Family Offices®. This Website Terms of Use and Disclosure document (the “Terms”) both describes our practices in collecting and processing data that is provided through our web site and establishes the terms on which users may use this web site. By accessing or using our web site located at <http://www.colonyfamilyoffices.com> (the “Site”), you (the “User”) signify that you have read, understand and agree to be bound by the terms stated within this document. Any updates to this document will be posted on this web site.

Colony’s security policy is intended to cover all corporate information and systems regardless of their physical location, the media on which it is stored, the systems that process it or the methods by which it is moved or transmitted.

USER DATA

The combination of your user identification and password enables you to be uniquely identified to certain areas of our Site. It is your responsibility to safeguard (and change, as needed) your login and password to ensure such identifiers are only being used by individuals with the authority to do so.

You are solely responsible for the data, messages, notes, text, email address(es) and other information that you upload on or through the Site (collectively, the “User Data”) or any other means. You are solely responsible at your sole cost and expense for creating personal backup copies of any User Data you post or store on the web site or provide to Colony.

When you post User Data to the Site, you authorize and direct Colony to make such copies thereof as deemed necessary in Colony’s sole discretion in order to facilitate the use and storage of the User Data on the Site and by Colony in performing services. By posting User Data to the Site, you represent that you have the authority and ability to post such information for Colony’s use and storage. Colony does not assert any ownership over your User Data; rather, you retain full ownership of all of your User Data and any intellectual property rights or other proprietary rights associated with your User Data.

COLONY CANNOT GUARANTEE THAT ANY USER DATA WAS ACTUALLY CREATED AND IS BEING OPERATED BY THE INDIVIDUAL OR ENTITY THAT CLAIMS TO HAVE SUBMITTED SUCH USER DATA. COLONY IS NOT RESPONSIBLE FOR THE CONTENT OF ANY USER DATA.

SITE CONTENT

When you enter the Site, we may collect your browser information (type, version, etc.) and your IP address. In addition, we may store certain information about you using “cookies” (collectively with the browser information and IP address, the “Site Content.”). A cookie is a piece of data stored on the User's computer tied to information about the User. We use cookies to associate users with their previous activity on the Site. The Site will “remember” your information making it easier for you to contribute when you come back to the web site. You can clear your browser's cookies (using the settings in your browser) if you want to disable this convenience feature.

YOUR CONSENT

By using our Site, you consent to the collection and use of your Personal Information by Colony. This document reflects our current policies and practices and is subject to change at any time in accordance with changes to those policies and practices. In the event of a change, a revised Internet Security Policy will be posted to our Site in a timely manner. You should review this document periodically to remain informed of any changes.

COLONY FAMILY OFFICES, LLC (“COLONY”) rev. 3/2019

FACTS	WHAT DOES COLONY DO WITH YOUR PERSONAL INFORMATION?
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: <ul style="list-style-type: none">• Social security number and assets• Income and risk tolerance• Account transactions and account balances When you are <i>no longer</i> our customer, we continue to share your information as described in this notice.
How?	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Colony chooses to share; and whether you can limit this sharing.

Reasons we can share your information	Does Colony share?	Can you limit this sharing?
For our everyday business purposes – such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes – to offer our products and services to you	Yes	No
For joint marketing with other financial companies	No	We do not share
For our affiliates’ everyday business purposes – information about your transactions and experiences	Yes	No
For our affiliates’ everyday business purposes – information about your creditworthiness	We do not collect	We do not share
For our affiliates to market to you	Yes	No
For non-affiliates to market to you	No	We do not share

To limit our Sharing	<p>We do not currently share your information except as necessary to manage your account or as required by law.</p> <p>Please note: if you are new investor, we can begin sharing your information 30 days from the date we sent this notice. When you are no longer an investor in our fund(s), we continue to share your information as described in this notice.</p>
-----------------------------	--

Questions?	Call (704) 285-7300, or email Sarah Brock at sbrock@colonycfo.com
-------------------	---

What we do	
How does Colony protect my personal 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.
How does Colony collect my personal information?	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> • Complete an investment advisory agreement or other forms • Open an account or seek advice about your investments • Make a wire transfer or direct us to buy securities.

Why can't I limit all sharing?	<p>Federal Law gives you the right to limit only</p> <ul style="list-style-type: none"> • Sharing for affiliates' everyday business purposes – information about your creditworthiness • Affiliates from using your information to market to you • Sharing for non-affiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing.</p>
What happens when I limit sharing for a partnership interest that I hold jointly with someone else?	Your choices apply to all parties, unless you inform Colony otherwise in writing.

Definitions	
Affiliates	<p>Companies related by common ownership or control. They can be financial and non-financial companies.</p> <ul style="list-style-type: none"> • Colony Trust Company, LLC
Non-affiliates	<p>Companies not related by common ownership or control. They can be financial and non-financial companies.</p> <ul style="list-style-type: none"> • <i>Colony may share personal information with non-affiliated third parties, such as broker dealers, banks and investment advisers for business purposes. Colony may also share personal information with parties who provide technical support, legal counsel, and accounting and compliance professionals.</i>
Joint marketing	<p>A formal agreement between non-affiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> • <i>Colony does not currently have non-affiliated joint marketing partners.</i>
Other important information:	