



PRIVACY NOTICE FOR CALIFORNIA RESIDENTS

Please read this privacy notice carefully.

The Exeter Group, LLC and its subsidiary and affiliate companies, including but not limited to, Exeter 1031 Exchange Services, LLC, Exeter Trust Company, Exeter Asset Services Corporation, Exeter Fiduciary Services, LLC, Exeter Management Corporation and Exeter SDIRA Corporation (hereinafter collectively referred to as, “Exeter,” “Our,” “Us,” “We” or “The Exeter Group of Companies”) **respect and are committed to protecting Your privacy.**

Pursuant to the California Consumer Privacy Act of 2018 (hereinafter referred to as “CCPA”), The Exeter Group of Companies and any websites, web pages and services operated by Exeter that are linked (hereinafter referred to as “Exeter Sites”) are providing this Privacy Notice for California Residents (hereinafter referred to as “CCPA Notice”).

This CCPA Notice supplements the information contained in Exeter’s existing privacy notice and is applicable solely to all visitors, users, clients, and others who reside in the State of California or are considered to be California Residents (hereinafter referred to as “Consumers,” “Your,” or “You”). Terms used but not otherwise defined shall have the meaning ascribed to them in the CCPA.

This CCPA Notice explains how We collect, use, and disclose Personal Information, when and to whom We disclose such information, and the rights You have regarding Your Personal Information.

Personal Information Collected by Exeter

Exeter collects information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular Consumer, household or device.

Most of the information collected by Exeter in the course of its regular financial services businesses is already protected under the Gramm-Leach-Bliley Act (hereinafter referred to as “Gramm-Leach”) and much of the information comes from government records or other information sources already in the public domain.

Personal information under the CCPA does not include:

- ✦ Information from publicly available government records; or,
- ✦ Aggregated, deidentified or non-specific consumer information; or,
- ✦ Personal information protected by other sector-specific Federal or California laws, including, but not limited to, the Fair Credit Reporting Act (FCRA), Gramm-Leach, Health Insurance Portability Act of 1996 (“HIPAA”) and California Financial Information Privacy Act (FIPA).

Exeter has collected within the last twelve (12) months, and will continue to collect, the following categories of Personal Information from Consumers:

- ✦ Identifiers such as real name, alias, postal address, telephone number, Internet Protocol address, email address, unique personal identifier, online identifier, account name, social security number (“SSN”), employer identification number (“EIN”), individual taxpayer identification number (“ITIN”), driver’s license number, state identification card number, passport number, financial information, tax information, credit card numbers, debit card numbers, date of birth, and/or other similar identifiers; and,
- ✦ Personal information categories listed in the California Customer Records statute (Cal. Civ. Code Section 1798.80(e)) such as real name, signature, alias, postal address, telephone number, Internet Protocol IP address, email address, unique personal identifier, online identifier, account name, social security number, employer identification number, individual taxpayer identification number, driver’s license number, state



identification card number, passport number, financial information, bank account number, credit card number, debit card number, insurance policy number, or any other financial information, tax information, education, employment, employment history, date of birth, physical characteristics or description, medical information or health insurance information, or other similar identifiers; and,

- ✦ Protected classification characteristics under California or Federal law such as 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, gender identify, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information); and,
- ✦ Commercial information such as records of real and personal property, products or services purchased, or other purchasing or consuming histories or tendencies; and,
- ✦ Biometric Information such as 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, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health or exercise data; and,
- ✦ Internet or other similar electronic network activity information such as, but not limited to, browsing history, search history, and information about a Consumer's interaction with an Internet website, web page, application, or advertisement; and,
- ✦ Geolocation data such as physical location or movements; and,
- ✦ Sensory data such as audio, electronic, visual, thermal, olfactory, or similar information; and,
- ✦ Professional or employment-related information such as current or prior employment history or performance evaluations; and,
- ✦ Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)) such as education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records; and,
- ✦ Inferences drawn or extrapolated from other personal information such as profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

Exeter collects the personal information referenced herein from the following sources:

- ✦ Directly and/or indirectly from clients and/or their advisors, designees or agents (for example, legal advisor, tax advisor, financial advisor, financial institution, Realtor[®], lender, escrow officer, title officer, etc.); and,
- ✦ Directly and/or indirectly from activity on Exeter Sites, including, but not limited to websites, web pages, internet portals, or other applications.
- ✦ Directly and/or indirectly from transactions with Exeter, Our subsidiaries, affiliates, business partners or others; and,
- ✦ Directly and/or indirectly from consumer reporting agencies and/or governmental entities, or through others.



Use of Personal Information Collected by Exeter

The CCPA requires Us to tell You what categories of personal information We “sell” or “disclose.” We do not sell and will never sell Your personal information as that term is commonly understood. We also do not sell and will never sell Your personal information, including the personal information of persons under 16 years of age, as that term is defined by the CCPA.

When it is necessary for a business purpose, We share or disclose Your personal information with a service provider, and We enter a contract with the service provider that limits how the information may be used and requires the service provider to protect the confidentiality of the information. We may also transfer to a third party the personal information of a consumer as an asset that is part of a merger, acquisition, bankruptcy, or other transaction in which the third party assumes control of all or part of Our business.

Exeter collects this personal information for the following business purposes, and may use or disclose the personal information it collects for one or more of the following business purposes:

- ✦ To provide products and services to You or in connection with a transaction involving You; and
- ✦ To perform under a contract between Exeter and the Consumer; and,
- ✦ To improve our products and services; and,
- ✦ To comply with legal, regulatory, or other government obligations; and,
- ✦ To protect against fraudulent or illegal activity; and,
- ✦ To communicate with You about Exeter or our affiliates; and,
- ✦ To maintain an account with Exeter or Our affiliates; and,
- ✦ To provide, support, personalize, and develop Our websites, products, and services; and,
- ✦ As described to You when collecting Your personal information or as otherwise set forth in the California Consumer Privacy Act.

Exeter will not collect any additional categories of personal information or use the personal information collected by Exeter for any materially different, unrelated, or incompatible purposes or use without providing You with due notice.

Disclosures of Personal Information Collected by Exeter to Affiliated Companies and Non-Affiliated Third Parties

Your information may be shared by Exeter with those that You have designated or appointed as Your agent in the course of Your transaction with Exeter (for example, legal advisor, tax advisor, financial advisor, financial institution, Realtor®, escrow officer, title officer, lender, etc.). Your personal information may be disclosed by Exeter to a third party for a business purpose. Exeter generally enters into a contract that describes the business purpose for releasing personal information and requests the recipient vendor of the personal information to keep it confidential and not use it for any purpose other than as permitted in the contract.

Exeter has disclosed during the preceding twelve (12) months, and will continue to disclose, Your personal information referenced above for a business purpose with the following categories of third parties:

- ✦ Exeter affiliates and subsidiaries; and,
- ✦ Non-affiliated third parties, as directed by You; and,



- ✦ Service providers and vendors such as corporate and trust accounting system vendors, client relationship management (“CRM”) system vendors, escrow and settlement services providers, title insurance providers, bank and financial services providers, billing, shipping, client service, auditing, marketing, and,
- ✦ Federal and state regulators, law enforcement and other government agencies; and,
- ✦ Businesses in connection with the sale or other disposition of all or part of the Exeter business and/or assets; and,
- ✦ Law enforcement or authorities in connection with an investigation, or in response to a subpoena or court order.

Sale of Personal Information:

In the preceding 12 months, Exeter has not sold any Personal Information, nor does Exeter intend to sell any Personal Information.

Personal Information of minors:

Exeter does not knowingly collect the Personal Information of minors.

Your Right to Know:

The CCPA provides California consumers with certain rights regarding their personal information. Consumers have a right to know about Personal Information collected, used, disclosed, or sold. Consumers have the right to request Exeter disclose what personal information it collected, used, and disclosed during the past 12 months.

Right to Request Deletion:

You have the right to request that We delete any of Your Personal Information that We collected from You, subject to certain exceptions and limitations. Once We receive and verify Your request and Your identity, We will delete (and direct Our service providers to delete) Your Personal Information from Our records unless an exception applies. We may deny Your request if retention of the information is necessary for Us or Our service providers to:

- ✦ Complete the transaction for which We collected Your Personal Information, provide a good or service that You requested, take actions reasonably anticipated within the context of Our ongoing business relationship with You, or otherwise perform pursuant to Our contract with You; or,
- ✦ Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities; or,
- ✦ Debug products to identify and repair errors that impair existing intended functionality; or,
- ✦ Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law; or,
- ✦ Comply with the California Electronic Communications Privacy Act (Cal. Penal Code §1546 et seq.); or,
- ✦ Engage in public or peer reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information’s deletion may likely render impossible or seriously impair the research’s achievement, if You previously provided informed consent; or,
- ✦ Enable solely internal uses that are reasonably aligned with consumer expectations based on Your relationship with Us; or,



- ✦ Comply with a legal, regulatory or other government required obligation; or,
- ✦ Make other internal and lawful uses of that information that are compatible with the context in which You provided it; or,
- ✦ If it is the type of personal information that falls outside the scope of the CCPA, (HIPAA, CIMA, GLBA, or publicly available information).

Right to Non-Discrimination:

Consumers have a right not to be discriminated against by exercising their consumer privacy rights. We will not discriminate against Consumers for exercising any of their California Privacy Rights.

Right to Use an Authorized Agent:

A Consumer may use an Authorized Agent to submit a request to know or a request to delete his or her information. Should a Consumer utilize an Authorized Agent, Exeter will require the Consumer to provide the agent with written permission to make the request and verify his or her identity with Exeter.

Request Access to or Deletion of Your Personal Information:

To exercise any of Your California Privacy Rights, please contact Us at:

The Exeter Group, LLC
National Corporate Headquarters
404 Camino del Rio South, Suite 600
San Diego, CA 92108
Email: notices@exeterco.com
Attn: Compliance Officer

Upon making a California Privacy Request, Exeter will verify Your identity by requiring an account number, transaction number, or other identifying information from You. We work to respond to a verifiable consumer request within 45 days of its receipt. If We require additional time, We will inform You of the extension period (up to an additional 45 days), and the reason for the extension in writing.

If You have an account with Us, We will deliver Our response to that account. If You do not have an account with Us, We will deliver Our response by U.S. mail or electronically, depending on Your preference. The response We provide will also explain any reasons why We cannot comply with Your request.

You may only make a consumer request for access twice within a twelve-month period. Any disclosures We provide will apply to the twelve-month period preceding Your request's receipt. The above rights are subject to any applicable rights and obligations including both Federal and California exemptions rendering Exeter, or Personal Information collected by Exeter, exempt from certain CCPA requirements.

Contact For More Information:

For questions or concerns about Exeter's California Privacy Notice and privacy practices, or to exercise any of Your California Privacy Rights, please contact Us at:

The Exeter Group, LLC
National Corporate Headquarters
404 Camino del Rio South, Suite 600
San Diego, CA 92108
Email: notices@exeterco.com



Attn: Compliance Officer

We may use Your Personal Information for Our affiliates (companies related to Exeter) to directly market to You. If You do not want Exeter affiliates to directly market to You, please contact Us at:

The Exeter Group, LLC
National Corporate Headquarters
404 Camino del Rio South, Suite 600
San Diego, CA 92108
Email: notices@exeterco.com
Attn: National Marketing Manager

California Privacy Notice – Effective Date:

This California Privacy Notice was last updated on Monday, February 7, 2022.