

FACTS

WHAT DOES ICONIQ CAPITAL, LLC AND AFFILIATES 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:

- Social Security Number
- Date of Birth
- Address
- Occupation and Employment Status
- Financial Goals
- Assets, Income and Account Balances
- Investment Experience and Risk Tolerance
- Information received from credit bureaus including credit history
- Information from your wills, trusts, and other estate planning documents
- Information about your holdings or transactions with us, our affiliates or others
- Mortgage rates & payments
- Wire transfer instructions

How?

All financial companies need to share Clients' personal information to run their everyday business. In the section below, we list reasons financial companies can share their Clients' personal information; the reasons ICONIQ Capital, LLC and its affiliates choose to share; and whether you can limit sharing.

Reasons we can share your personal information	Does ICONIQ 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 don't 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	NO	We don't share
For our affiliates to market to you	NO	We don't share
For non-affiliates to market to you	NO	We don't share

Questions / Complaints

Please direct all questions or complaints to: Jason Craig, Chief Compliance Officer at ICONIQ Capital, LLC, P.O. Box 2929 San Francisco, CA, 94126-2929, Phone 415-967-7763 or legal@iconiqcapital.com.

Who we are

Who is providing this notice? ICONIQ Capital, LLC and its affiliates (as defined below; collectively, “ICONIQ” or “we”).

What we do

How does ICONIQ 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. We have policies and procedures designed to reasonably ensure the proper handling of customer information by employees and to require third parties to adhere to appropriate security and confidentiality standards.

How does ICONIQ collect my personal information? We collect your personal information, for example, when you:

- Seek advice about your investments or make deposits or withdrawals from your account
- Give us your income information or contact information
- Open an account
- Fill out subscription documents for investment funds or vehicles
- Pay your bills using our bill pay services
- Enter into an advisory contract

We also collect your personal information from other companies.

Why can't I limit all sharing? Federal Law gives you the right to limit only:

- Sharing for affiliates’ everyday business purposes – information about your credit worthiness
- Affiliates from using your information to market to you
- Sharing for non-affiliates to market to you

State laws and individual companies may give you additional rights to limit sharing [See below for more on your rights under state law.]

Definitions

Affiliates Companies related by common ownership or control. They can be financial and non-financial companies. *Our affiliates include without limitation companies with an ICONIQ or ICQ name, such as:*

- | | |
|--|--|
| ▪ <i>ICONIQ Access fund family</i> | ▪ <i>ICQ Ethos fund family</i> |
| ▪ <i>ICQ Investments fund family</i> | ▪ <i>ICQ CS fund family</i> |
| ▪ <i>ICQ Opportunities fund family</i> | ▪ <i>ICONIQ Building Blocks fund family</i> |
| ▪ <i>ICQ CPE/CVC fund family</i> | ▪ <i>ICONIQ Residential Partners fund family</i> |
| ▪ <i>ICONIQ Strategic Partners fund family</i> | ▪ <i>IREP Opportunities fund family</i> |

Non Affiliates Companies not related by common ownership or control. They can be financial and non-financial companies.

Nonaffiliates we share with can include:

- | | |
|---|--|
| ▪ <i>Broker-Dealers or Banks</i> | ▪ <i>Claims processors</i> |
| ▪ <i>Payment processors</i> | ▪ <i>ICONIQ’s service providers</i> |
| ▪ <i>Vendors to the respective client, including attorneys, accountants, etc.</i> | ▪ <i>Other third-parties in relation to ICONIQ’s services to you</i> |

Joint Marketing A formal agreement between nonaffiliated financial companies that together market financial products or services to you. *ICONIQ doesn’t jointly market.*

Other Important Information

California Residents: Except as permitted by law, we do not share nonpublic personal information we collect about California residents with non-affiliates. We restrict sharing with affiliates to comply with applicable California privacy laws.

Nevada Residents: We are providing you this notice under state law. At your election, you may be placed on our Do Not Call list by calling us at 415-967-7763. You may obtain more information concerning Nevada Protection by contacting the following: Bureau of Consumer Protection, Office of the Nevada Attorney General, 555 E. Washington St., Suite 3900, Las Vegas, NV 89101; Phone number- 702-486-3132; email: BCPINFO@ag.state.nv.us.

Vermont Residents: Under Vermont law, we will not share information we collect about Vermont residents with companies who are not affiliates, except as permitted by law, such as with your consent or to service your accounts. We will not share information about your creditworthiness with our affiliates without your authorization or consent, but we may share information about our transactions or experiences with you with our affiliates without your consent.