

Privacy Policy

Effective as of August 2023

We Care About Your Privacy

SEAVIEW INVESTMENT MANAGERS LLC (hereon as “**SEAVIEW IM**”) is committed to respecting your privacy and to complying with applicable data privacy laws. This privacy statement (“Statement”) describes how we collect and use personal data where **SEAVIEW IM** is the data controller or where we refer to the applicability of this Statement. “Personal data” means information about you or another identifiable individual.

Our website and services may contain links to other companies’ websites and services that have privacy notices of their own. **SEAVIEW IM** is not responsible for the privacy practices of others, and we recommend you read their privacy notices.

You are not required to provide personal data to **SEAVIEW IM**. However, if you choose not to provide your personal data to **SEAVIEW IM**, we may not be able to provide you with our products and services or to respond to queries you have.

What Information Do We Collect?

We collect your personal data and other information when you register for our workshops, engage **SEAVIEW IM** for our services, or otherwise interact with us. This includes the following categories:

- Workshop registration.
- Engagement to provide “Personal Financial Planning” services.
- Use of our material and tools.
- Access to our online services and material we publish on our websites.
- Additionally, we may invite you to join voluntarily to provide feedback for the improvement of our services where detailed information is collected.
- **SEAVIEW IM** maintains records of your transactions, the data you have provided us with, your requests, and agreements between you and **SEAVIEW IM**. We may, in accordance with applicable law, record your communication with our customer care team or with other such contact points.

Why Do We Process Personal Data?

SEAVIEW IM may process your personal data for the following purposes. One or more purposes may apply simultaneously.

- Providing products and services: We may use your personal data to provide you with our products and services, to process your requests or as otherwise may be necessary to perform the contract between you and **SEAVIEW IM**, to identify you to provide the product or service as well as to prevent and investigate fraud and other misuses.
- Accounts: Some services may require an account to help you manage your content and preferences.
- Developing and managing products and services: We may use your personal data to develop and manage our products, services, customer care, sales, and marketing. We may combine personal data collected in connection with your use of a particular **SEAVIEW IM** product and/or service with other personal data that we may have about you unless such personal data was collected for a different purpose.
- Communicating with you: We may use your personal data to communicate with you, for example to inform you that our services have changed or to send you notices relating to our products and/or services and to contact you for customer care-related purposes.
- Marketing, advertising, and making recommendations: We may contact you to inform you of new products, services, or promotions we may offer and to conduct market research when we have your consent, or it is otherwise allowed. We may use your personal data to personalize our offering and to provide you with more relevant services.

SEAVIEW IM processes your personal data with your consent or as necessary to complete any transaction or provide any product or service you have requested or authorized. We may also process your personal data when required by law; to protect our customers; to maintain the security of our products and services; and to protect rights and property of **SEAVIEW IM**.

Do We Share Personal Data?

We do not sell, lease, rent or otherwise disclose your personal data to third parties unless otherwise stated below.

- Your consent and social sharing services: We may share your personal data if we have your consent to do so.
- **SEAVIEW IM** and authorized third parties: We may share your personal data with other **SEAVIEW IM** companies or authorized third parties who process personal data for **SEAVIEW IM** for the purposes described in this Statement. This may include for example billing, providing services including customer service, managing, and analyzing consumer data, credit checks, conducting research and managing marketing and other such campaigns.

We may conduct joint marketing and other communications with our authorized third-party partners. To avoid duplication of or unnecessary communications and to tailor the message to you we may need to match information that **SEAVIEW IM** has collected with information that the partner has collected where this is permitted by law.

These **SEAVIEW IM** authorized third parties are not permitted to use your personal data for any other purposes. We require them to act consistently with this Statement and to use appropriate security measures to protect your personal data.

- Mandatory disclosures: We may be obligated by mandatory law to disclose your personal data to certain authorities or other third parties. We may also disclose and otherwise

process your personal data in accordance with applicable law to defend **SEAVIEW IM**'s legitimate interests, for example, in civil or criminal legal proceedings.

- **Mergers and Acquisitions:** If we decide to sell, buy, merge, or otherwise reorganize, this may involve us disclosing personal data to prospective or actual purchasers and their advisers, or receiving personal data from sellers and their advisers.

Do We Address the Privacy of Children?

SEAVIEW IM products and services are typically intended for general audiences. **SEAVIEW IM** does not knowingly collect information of children under the age of 13, or equivalent minimum age under applicable law, without the consent of their parents or guardians.

How Do We Address Data Quality?

We take reasonable steps to keep the personal data we possess accurate and to delete incorrect or unnecessary personal data. We will only retain your personal data for as long as necessary to fulfill the purposes outlined in this Statement or otherwise communicated to you unless a longer period is required by law.

We encourage you to access your personal data through your account from time to time to help us ensure that it is up to date.

What Steps Are Taken to Safeguard Personal Data?

Privacy and security are key considerations in the creation and delivery of our products and services. We have assigned specific responsibilities to address privacy and security related matters. We enforce our internal policies and guidelines through an appropriate selection of activities, including proactive and reactive risk management, security and privacy engineering, training, and assessments. We take appropriate steps to address online security, physical security, risk of data loss and other such risks taking into consideration the risk represented by the processing and the nature of the data being protected. Also, we limit access to our databases containing personal data to authorized persons having a justified need to access such information.

How Do We Use Cookies and Web Beacons?

SEAVIEW IM and our third-party service providers may use cookies, web beacons and other similar technologies to operate and improve our websites and offering. Cookies are small amounts of data that are sent to your internet browser from a web server and stored on your computer's local storage. Cookies help us collect information about visitors to our websites, including date and time of visit, web pages viewed, amount of time spent on our websites or general information about the device used to access our websites. Our cookies and similar technologies do not contain any personally identifying information. The information they provide may be used for various purposes, including creating aggregate statistics, determining audience size, measuring traffic patterns, analyzing clickstreams, helping keep your session secure, and providing relevant advertisements. If you do not wish to receive cookies, most

internet browsers allow you to turn cookies off so that you do not receive them. If you do turn your cookies off, you will not be able to use some services or features.

What Are Your Rights?

You have the following rights regarding personal data that **SEAVIEW IM** processes about you:

- **Access:** You have a right to know what personal data we hold about you and to obtain a copy.
- **Data portability:** Subject to law, you have a right to obtain in machine readable format the personal data you have provided to **SEAVIEW IM**.
- **Rectification and erasure:** You have a right to have incomplete, incorrect, unnecessary, or outdated personal data about you deleted or updated.
- **Withdraw your consent:** You have the right to withdraw your consent for **SEAVIEW IM** to process your personal data.
- **Unsubscribe and object:** You have a right to unsubscribe from direct marketing messages and to request that we stop processing your personal data for direct marketing purposes or we delete your personal data on other grounds.

You may exercise your rights by managing your account and choices through our products and services or, if that is not possible, by contacting us. In some cases, if you withdraw your consent or wish us to delete or stop processing your personal data, we may not be able to continue to provide the services to you. If you are not satisfied with what we provide when you exercise your rights, you can let us know by contacting us. If you are still dissatisfied, you also have the right to lodge a complaint with the relevant supervisory authority.

Who Is the Controller of Your Personal Data?

SEAVIEW IM is the controller of your personal data. In matters pertaining to **SEAVIEW IM**'s privacy practices, you may also contact us at:

SEAVIEW IM

2 Alhambra Plaza, Suite 802
Coral Gables, FL 33134

SEAVIEW IM may change this Statement at any time with or without notice. However, if this Statement is changed in a material, adverse way, **SEAVIEW IM** will post a notice advising of such change at the beginning of this Statement and on this site's home page for 30 days. We recommend that you re-visit this Statement from time to time to learn of any such changes to this Statement.