



Green Street Investors

PRIVACY NOTICE

Maintaining the trust and confidence of our clients is a high priority. That is why we want you to understand how we protect your privacy, when we collect and use information about you, and the steps that we take to safeguard that information. This notice is provided to you on behalf of Green Street Investors, LLC ("GSI").

Information We Collect: In connection with providing investment products, financial advice, or other services, we obtain non-public personal information about you, including:

- Information we receive from you on account applications, such as your address, date of birth, Social Security Number, occupation, financial goals, assets and income;
- Information about your transactions with us, our affiliates, or others;
- Information about your visit to our website is stored on our web server logs, which are records of your activities on our sites. The servers automatically capture and save the information electronically. The information we collect in web server logs helps us administer the site, analyze its usage, protect the website and its content from inappropriate use and improve the user's experience.

Categories of Information We Disclose: We may only disclose information that we collect in accordance with this policy. GSI does not sell customer lists and will not sell your name to telemarketers.

Categories of Parties to Whom We Disclose: We will not disclose information regarding you or your account at GSI, except under the following circumstances:

- To entities that perform services for us or function on our behalf, including financial service providers, such as a clearing broker-dealer, investment company, or insurance company, other investment advisers;
- To comply with broker-dealer firms that have regulatory requirements to supervise certain representatives' activities;
- To third parties who perform services or marketing, client resource management or other parties to help manage your account on our behalf;
- To your attorney, trustee or anyone else who represents you in a fiduciary capacity;
- To our attorneys, accountants or auditors; and
- To government entities or other third parties in response to subpoenas or other legal process as required by law or to comply with regulatory inquiries.

How We Use Information: Information may be used among companies that perform support services for us, such as data processors, client relationship management technology, technical systems consultants and programmers, or companies that help us market products and services to you for a number of purposes, such as:

- **To protect your accounts/non-public information** from unauthorized access or identity theft;
- **To process your requests** such as securities purchases and sales;
- **To establish or maintain an account with an unaffiliated third party**, such as a clearing broker-dealer providing services to you and/or GSI;
- **To service your accounts**, such as issuing checks and account statements;
- **To comply** with Federal, State, and Self-Regulatory Organization requirements;
- **To keep you informed** about financial services of interest to you.

Regulation S-AM: Under Regulation S-AM, a registered investment adviser is prohibited from using eligibility information that it receives from an affiliate to make a marketing solicitation unless: (1) the potential marketing

use of that information has been clearly, conspicuously and concisely disclosed to the consumer; (2) the consumer has been provided a reasonable opportunity and a simple method to opt out of receiving the marketing solicitations; and (3) the consumer has not opted out. GSI does not receive information regarding marketing eligibility from affiliates to make solicitations.

Regulation S-ID: Regulation S-ID requires our firm to have an Identity Theft Protection Program (ITPP) that controls reasonably foreseeable risks to customers or to the safety and soundness of our firm from identity theft. We have developed an ITPP to adequately identify and detect potential red-flags to prevent and mitigate identity theft.

Our Security Policy: We restrict access to nonpublic personal information about you to those individuals who need to know that information to provide products or services to you and perform their respective duties. We maintain physical, electronic, and procedural security measures to safeguard confidential client information.

Cyber Security: Internal policies and procedures are in place to address cyber security. A copy of this policy is available upon request.

Succession Planning: In the event that the owner(s) of GSI retire, become incapacitated or should perish unexpectedly, your information could be disclosed to an unaffiliated third party for the purposes of facilitating a business succession plan. A change in control of ownership of GSI would require your consent, as dictated by your signed agreement with GSI, in order to continue providing services to you.

Information We Disclose: We do not disclose any nonpublic personal information about our customers or former customers to anyone, except as permitted by law. In accordance with Section 248.13 of Regulation S-P, we may disclose all of the information we collect, as described above, to certain nonaffiliated third parties such as attorneys, accountants, auditors and persons or entities that are assessing our compliance with industry standards. We enter into contractual agreements with all nonaffiliated third parties that prohibit such third parties from disclosing or using the information other than to carry out the purposes for which we disclose the information.

Closed or Inactive Accounts: If you decide to close your account(s) or become an inactive customer, our Privacy Policy will continue to apply to you.

Complaint Notification: Please direct complaints to: Robyn Francis at Green Street Investors, LLC, 100 Bayview Circle, Suite 400, Newport Beach, CA 92660; 949-640-8780; rfrancis@greenstreetadvisors.com.

Changes to This Privacy Policy: If we make any substantial changes in the way we use or disseminate confidential information, we will notify you. If you have any questions concerning this Privacy Policy, please contact us at: Green Street Investors, LLC, 100 Bayview Circle, Suite 400, Newport Beach, CA 92660; 949-640-8780.

Keeping up-to-date with our Privacy Policy: GSI will provide notice of our privacy policy annually, as long as you maintain an ongoing relationship with us. If, at any time in the future, it is necessary to disclose any of your nonpublic personal information in a way that is inconsistent with this policy, we will give you advance notice of the proposed change so that you may have the opportunity to opt out of such disclosure. Additionally, since this policy may change from time to time, you can always review our current policy by contacting us for a copy at: (949) 640 – 8780.

EU Residents: If you are located in the EU, please read our *European Privacy Policy* to learn how we process your personal information and your choices about your information. It is located at https://gstqa-us-west.s3.amazonaws.com/public_files/EuropeanPoliciesandDisclosures.pdf.

California Consumer Privacy Act (CCPA):

The act provides California consumers:

- The right to know what personal information is collected, used, shared or sold
- The right to delete personal information held by businesses
- The right to opt-out of the sale of personal information.
- The right to non-discrimination

Personal information under CCPA is information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household.

Personal information does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA's scope (ie, HIPPA, GLBA, and FIPA) – Green Street Investors falls under the scope of the Gramm-Leach-Bliley Act - GLBA (which requires financial institutions to explain their information-sharing practices and to protect sensitive data).

California consumers have the right to make a personal information request twice in a 12-month period:

- To request how we collect and have used your personal information over the past 12 months.
- To request deletion of any personal information collected. Note, we may deny your request if retaining the information is necessary to provide contractual service, comply with legal obligations, protect against illegal activity, etc.

We will respond to a **verifiable** consumer written request within 45 days of its receipt. Send requests to:

Green Street Investors
Compliance
100 Bayview Circle, Suite 400
Newport Beach, CA 92660

Or call toll free 888-640-8780

We do not disclose personal information to a third party for monetary or other valuable consideration. We do not sell customer information.

You may also download our privacy policy including our Opt-out form on our website:

www.greenstreetinvestors.com

No discrimination will be brought against you for exercising these rights, including denial of service, quality of service, or increase price of service.

“Opt Out” Notification Form

As described in this brochure, we are committed to protecting your privacy. If you prefer that we not share certain information about you with outside companies, you may choose to opt out. This means that you may direct us at any time not to disclose this information to these outside companies for marketing purposes. Therefore, if you wish to notify us to limit such disclosures of your personal information, please indicate your choice(s) by marking the appropriate box or boxes below.

Please include your name, address, and social security number and/or tax identification number. Then detach and send this form to the address listed below so we may honor your request. If you have previously communicated an opt out choice to us, you do not have to provide it again.

Name: _____

Address: _____

City: _____ **State:** _____ **Zip Code:** _____

Social Security Number/Tax ID Number: _____

1. ___ Please limit the personal information about me that you disclose to nonaffiliated third parties as described in this brochure.

If you check #1, we will not make these disclosures except as permitted by law, including disclosures necessary to process your account transactions.

2. ___ Please limit the personal information about me that you share with GSI affiliates as described in this brochure.

The law allows us to share with our affiliates any information about our transactions or experiences with you. However, if you check #2, we will not share with our affiliates other information that you provide to us or that we obtain from third parties, unless otherwise permitted by law.

If you have checked any of the boxes above, please mail this form to:

Green Street Investors
Compliance
100 Bayview Circle, Suite 400
Newport Beach, CA 92660

If you prefer, you can call us and Opt-Out at 888-640-8780.

A confirmation of receipt letter will be sent to the address listed on the Opt-Out Notification Form.