



## Privacy Policy

The following document details the privacy policy for Griffin Capital Securities, LLC, the dealer manager of investment products sponsored or co-sponsored by Griffin Capital Company, LLC. Griffin Capital Securities, LLC considers the protection of sensitive information to be a sound business practice and the foundation of client trust. We understand your concerns regarding the safeguarding of information about you and your investment, and we want to assure you that we have taken the proper steps to protect the confidentiality of that information. We may use this information to effect, administer and deliver investments and services; to respond to inquiries from you or your representative, or to fulfill legal and regulatory requirements. We do not share investors' personal information with other companies for marketing purposes. Griffin Capital Securities, LLC, has adopted this and/or additional privacy policies to reinforce this commitment and to address the concerns of the Gramm-Leach-Bliley Act of 1999, which requires each member of the financial services industry to communicate its privacy policy to consumers and existing clients. This privacy policy describes our efforts to meet these objectives. It includes a summary of the personal information we collect, when it may be shared with others, how we safeguard the confidentiality and security of information, and the steps that we take to limit our sharing of such information with others. Please read it carefully.

### 1. What Personal Information Do We Collect?

To effectively and efficiently process your transaction and service your account, it is important that we collect and maintain accurate non-public personal information about you. We may obtain the following information from you, your registered representative and/or broker dealer or from the following sources:

- Name, address, telephone number, social security number, date of birth, annual income and net worth, from your subscription agreements, applications and other forms you submit to us.
- Investment balances, investment history and tax returns you provide to us, in writing, electronically, or through the telephone, as applicable.
- Credit history from consumer reporting agencies.
- Your internet service provider, your domain name, your computer's operating system and web browser, your web site use and your product and service preferences from your visits to our web sites.

### 2. Is Personal Information Shared With Others?

We limit the sharing of information with others. We maintain information protection controls in keeping with industry standards and practices, and we regularly adapt these physical, electronic and procedural controls to respond to changing requirements and advances in technology. We do not disclose any non-public personal information, except as required or permitted by law, i.e. subpoena responses, regulatory inquiries, to deter fraud. There are, however, circumstances in which we may share the information we collect about you, as described in Section 1, with other affiliated and/or non-affiliated companies in order to service your investment effectively. We require these companies to adhere to our privacy standards and to use this information only for the limited purpose for which it was shared. We do not allow them to disclose it to others. We may share the personal information that we receive about our consumers, clients, prospects or former clients, with their broker-dealers and registered representatives, or with the following types of entities:

#### a) Sharing Personal Information with Affiliated Parties

We restrict access to information to those who require that access in order to provide investments and services to you. In order to provide you with access to these investments and services, we may share the information we collect about you, as described in Section 1, with members of our affiliated companies.

b) Sharing Personal Information with Non-affiliated Parties

We may share the information we collect about you, as described in Section 1, with non-affiliated service providers (for example, accounting firms that prepare tax reporting information, transfer agents providing distribution services and banks that handle wire transfers and escrow investments). Federal and state regulators also may review firm records as permitted by law.

c) Sharing Personal Information with Others

We do not disseminate the information we collect about you, as described in Section 1, to any non-affiliated third parties for marketing purposes. Therefore, clients will neither need to nor have the opportunity to opt out of the disclosure of non public personal information.

### 3. Privacy Online

We consider privacy, security and service to be just as critical in the online environment as in the rest of our operations. We therefore employ all of the safeguards previously described while providing investment information over the Internet. In addition, we use a variety of protections to maintain the security of an investor's online session. For example, no one has access to your proprietary data online without the use of a personalized user name and the corresponding login number. We may collect technical and navigational information, such as computer browser type, Internet protocol address, pages visited and average time spent on our Web site. This information may be used, for example, to alert an investor to software compatibility issues, or it may be analyzed to improve our web design and functionality. We do not share e-mail addresses with other companies for marketing purposes.

### 4. How Do We Protect the Confidentiality, Security and Integrity of Information About You?

We have always considered the protection of sensitive information to be of utmost importance. We maintain physical, electronic and procedural safeguards to protect the information we collect about investors. Access to such information is restricted to individuals who need it in order to provide services to investors, and who are trained in the proper handling of such information. Where third parties provide support services, we require them to conform to our privacy standards. It is important that the information we maintain about our investors is accurate and complete. If an investor sees information in quarterly statements or elsewhere which suggests that our information is incomplete or inaccurate, they are encouraged to notify us in writing so that we can update this information. We will use a combination of safeguards to protect our investors against the criminal use of their information and to prevent unauthorized access to it and will dispose of private financial information in accordance with state and federal laws. Although we take these measures to protect your information, we are unable to guarantee non public personal information from ultimately being compromised through the internet (e.g. hackers) or by third parties.

Griffin Capital Securities, LLC, Member FINRA/  
SIPC 18191 Von Karman Avenue, Suite 300  
Irvine, CA 92612  
949.270.9300