

## WEB PRIVACY POLICY

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Kovitz Investment Group Partners, LLC; New Millennium Fundamental Hedged Equity, L.P.; and New Millennium Fundamental Hedged Equity QP, L.P. (hereafter collectively referred to as the “Kovitz Companies,” “We,” “Us,” or “Our”) obtain certain personal information about you in the course of our business. We are committed to maintaining the confidentiality, integrity and security of such information and to respecting the privacy of our clients and associated persons, and other individuals whose personal information we collect and process. If you are a customer of the Kovitz Companies, please see our annual [Privacy Notice](#), which outlines how we handle your personal information. This Privacy Policy describes how we handle the information of non-customers who visit our Web site, subscribe to our newsletters, or otherwise provide us with personal information.

### SOURCES OF PERSONAL INFORMATION

When you visit this Web site, you may provide us with two types of information: personal information you knowingly and voluntarily choose to disclose in an online form, and information that we automatically collect as you browse this Web site.

**Information You Voluntarily Submit** - We collect and store any information you enter on this Web site. Specifically, when you fill out an online form on this Web site to sign up for our mailing list or request to be contacted, we store that information and use it to facilitate your request. You may contact us to change any of your personal information at any time.

**Information Collected and Stored Automatically** - When you browse this Web site, you and your Web browser may also transmit information that we automatically collect. We log your IP address (the Internet address of your computer), the Web pages you visit and the time of your visit, and other click-stream data. We also collect the type of computer, operating system and browser you are using. This information is provided by your browser, which we use to improve the performance of this Web site and make it more compatible with the technology used by the visitors of this Web site. We may also place small data files, called “cookies” in the browser file of your computer’s hard drive. These cookies automatically identify your browser to our server whenever you interact with this Website. We use the cookies to record Website statistics. Most browsers automatically accept the cookies, but you usually can change your browser setting to prevent the acceptance of cookies. Certain Web pages will not function properly if you choose not to accept cookies.

### CATEGORIES OF PERSONAL INFORMATION AND HOW WE USE IT

The personal information collected by the Kovitz Companies includes:

- ◆ Identifiers (name, e-mail address, mailing address, telephone number, date of birth)
  - We use this information to respond to your requests and communicate with you.
- ◆ Internet or other electronic network activity information.



-We use this information to improve the performance of this Web site and make it more compatible with the technology used by the visitors of this Web site.

We may also use collected information to help diagnose problems with this Web site. We may use all information we collect to analyze statistical use patterns and to improve this Web site to better serve our customers. We use your IP address to help diagnose problems with our servers, and to administer this Web site.

#### DISCLOSING YOUR PERSONAL INFORMATION TO OTHERS

***We do not sell any of your personal information, including your name, mailing address or email address, to any companies.***

We also do not disclose your personal information to third parties, except as described in this policy. Third party disclosures may include sharing such information with non-affiliated companies that perform support services, including those that provide professional, legal or accounting advice to the Kovitz Companies. Non-affiliated companies that assist us in providing services to you are required to maintain the confidentiality of such information to the extent they receive it and to use your personal information only in the course of providing such services and only for the purposes that we dictate.

We may also disclose your personal information to fulfill your instructions, to protect or exercise our rights and interests and those of our business partners, or as part of a corporate transaction with a successor or affiliate or in connection with any acquisition, merger, or sale of equity or assets, or pursuant to your express consent. Under limited circumstances, your personal information may be disclosed to third parties as permitted by, or to comply with, applicable laws and regulations or as required by law enforcement officials; for instance, when responding to a subpoena, court order or similar legal process, to protect against fraud and unauthorized transactions, and to otherwise cooperate with law enforcement or regulatory authorities.

#### LINKS TO OTHER SITES

We may create links to other Web sites that we think may be of interest to you. We do not endorse any other Web sites, and this Privacy Policy applies only to your use of this Web site. We have not reviewed the privacy policies of any Web sites we link to this Web site, and you should read the privacy policies of each Web site you visit to determine what information about you that Web site may collect and use.

#### RETENTION

We will keep your personal information only for as long as reasonably necessary to fulfill the purposes for which personal information is collected as stated herein; for as long as is necessary for the performance of the contract between you and us, if any; and to comply with legal and statutory obligations. When we no longer need your personal information for our purposes, we will destroy, delete or erase that personal information or convert it into an anonymous form.

#### SECURITY



Because we are committed to your privacy, we have put in place physical, electronic, and managerial procedures to attempt to safeguard and help prevent unauthorized access, maintain data security, and correctly use the personal information we collect online. However, please remember that no transmission of data over the Internet or any wireless network can be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot ensure or warrant the security of any information that you transmit to our Web site, and you do so at your own risk.

## **YOUR CALIFORNIA PRIVACY RIGHTS**

If you are a resident of the state of California, the following rights are available to you under the California Consumer Privacy Act.

### **Right to access**

You have the right to request that we disclose the categories of personal information collected, the categories of sources from which personal information is collected, the business or commercial purpose for collection, the categories of third parties with which we share personal information, and the specific pieces of personal information that we have about you. You also have the right to request that we provide your personal information to you in a readily useable format.

### **Right to request deletion**

You have the right to request that we delete personal information that we collected from you. Note, however, that certain requests to delete personal information may be denied if we are required to retain the information as a matter of law, the information is necessary for detecting security incidents, exercising free speech, protecting or defending against legal claims, or for internal uses reasonably aligned with consumer expectations.

### **Right to non-discrimination**

You have the right not to receive discriminatory treatment by us for exercise of these privacy rights. We do not offer financial incentives related to the provision of data.

### **Authorized agent**

You have the right to designate an authorized agent to make these requests on your behalf.

To exercise any of these rights, please contact us at 877-714-2327 or [compliance@kovitz.com](mailto:compliance@kovitz.com). We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

## **CHANGES IN OUR PRIVACY POLICY**



By using this Web site, you consent to our collection and the use of your personal information as described in this Privacy Policy. If we change our Privacy Policy, we will post these changes on this Web site. You have the opportunity to review this Privacy Policy each time you use this Web site so that you are aware of any modifications made to these policies.

#### CHOICE/OPT OUT

You have the right to opt out of receiving communications the Kovitz Companies. You have the option of reviewing or removing your information from our database, and to no longer receive communication from us. You can send e-mail to [compliance@kovitz.com](mailto:compliance@kovitz.com). You can send mail to the following postal address:

Kovitz  
Attn: Privacy  
71 S Wacker Dr., Suite 1860  
Chicago, IL 60606

Please note that due to e-mail production schedule, you may receive an e-mail message after you have provided your opt-out notice.

#### QUESTIONS ABOUT OUR PRIVACY POLICY.

If you have questions about this Web site or this Privacy Policy, please feel free to contact us at [compliance@kovitz.com](mailto:compliance@kovitz.com).