

Effective Date: December 31, 2023

# PRIVACY POLICY

Tiedemann Advisors, LLC, Tiedemann Trust Company, and Alvarium Investment Advisors (US), Inc. form the U.S. Wealth Management division of AITi Global, Inc. (collectively “AITi USWM” “we,” “us,” or “our”). AITi USWM is committed to safeguarding and protecting client confidential information and privacy. We do not share or disclose any non-public Personal Information about our clients or former clients to nonaffiliated third parties, except as permitted by law, as further described below. The Gramm Leach Bliley Act (“GLBA”) and the adoption of Regulation S-P by the Securities and Exchange Commission (“SEC”) require that an investment adviser registered with the SEC establish policies and procedures to ensure proper management of client information in a private and secure manner.

This Privacy Policy (“Policy”) provides notice to you about our privacy policies and practices. This Policy also applies to information we collect on you, including information we collect from you through various methods, including information collected from your use of our website (<https://altiglobal.com/>) (our “Site”). If you require a version of this Policy in an alternative accessible format, please contact us at the contact information at the end of our Policy. AITi USWM shall maintain the privacy of its clients and former clients and their Personal Information (defined below) in the manner disclosed in this Policy.

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## I. Privacy Notice

### A. Privacy Statement

The following statement explains how AITi USWM handles the Personal Information that we receive about our current and former clients. AITi USWM is committed to protecting the privacy and confidentiality of client's and former client's non-public Personal Information. For the purpose of this Policy, Personal Information means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. Please note, that **Section III (California Privacy Rights) of this Policy does not apply to Personal Information covered or collected under or pursuant to GLBA, de-identified or aggregate information, or public information lawfully available from governmental records.**

### B. Information Collection

AITi USWM may collect Personal Information through the client, or the client's authorized representative, completing forms and applications relating to the client's account or our services. Additionally, AITi USWM may collect Personal Information from the client's, or the client's authorized representative's, further interactions and communications with AITi USWM (including in-person, phone, and electronic) relating to the client's account or our services. The Personal Information we collect may include, but is not limited to, the client's name, e-mail and postal address, phone number, government identifiers, assets, income, financial needs and goals, account balances and transactions (including those with unaffiliated third parties), profile information, background information, and family information (including information regarding dependents and beneficiaries and client objective information).

### C. Information Disclosed and Categories of Affiliates and Non-Affiliated Third Parties to who AITi USWM may Disclose

It is AITi USWM's policy not to disclose non-public Personal Information about our client(s) to any other parties except where required by law or authorized by the client, or authorized client's representative, or according to this Policy. From time to time, AITi USWM may disclose Personal Information collected from clients to third-party service providers that facilitate the operation of some areas of our investment advisory business and help administer our accounts, and AITi USWM may also use such Personal Information in the account intake process, including conducting anti-money laundering screening. We require any third-party service providers to protect the confidentiality of your Personal Information and to use it only for the purposes for which we disclose the information to them.

### D. Safeguards

AITi USWM uses the following security measures to protect the privacy of clients. All non-public Personal Information in our systems is guarded by technical and organizational controls designed to mitigate security risks and ensure the security, integrity and availability of our systems and data. In instances where non-public Personal Information is exchanged via the internet, electronic and procedural methods to safeguard this exchange are used. It is the policy of AITi USWM to ensure non-public Personal Information about a client is protected, stored, maintained, and disposed of in ways designed to ensure such information is safeguarded from unauthorized uses or disclosures. However, while AITi USWM uses reasonable information security practices, cybercriminals are increasingly persistent and sophisticated, and no information security program can guarantee perfect security.

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## E. Service Providers

AITi USWM shares information with non-affiliated third-party service providers in order for the third party to carry out its services for us, including service providers that help support our marketing, outreach, security and IT functions, and reporting as well as service providers that acts as our auditors and advisors.

## F. Processing and Servicing Transactions

AITi USWM may share information when it is necessary to effect, administer, or enforce a transaction for our clients or if a client initiates a request for us to share Personal Information with an outside party. All requests by clients must be received in writing from the client.

## G. Sharing as Permitted or Required by Law

AITi USWM may disclose Personal Information to non-affiliated third parties as permitted by law. For example, this may include a disclosure in connection with a subpoena or similar legal process, a fraud investigation, recording of deeds of trust and mortgages in public records, an audit or examination, or the sale of an account to another financial institution.

## H. Privacy Notice Delivery

All new clients shall receive an initial privacy notice prior to entering into an investment advisory agreement, as well as an annual privacy notice.

# II. Personal Information Collection and Use

## A. Personal Information We Collect and Have Collected in the Past 12 Months – Sources and Categories

In the 12 months preceding the date of this Policy, we may have collected your Personal Information when you visited our Site, requested information about our products or services, provided us with your information at a conference or other event, clicked through links on our Site to watch or listen to archived events or presentations, or when you voluntarily provided information to us through our Site, email, or phone number. We will continue to collect Personal Information from the same sources.

The categories of Personal Information we may have collected from these sources during the 12 months preceding the date of this Policy, and will continue to collect, include the following:

- **Personal identifiers:** Name, address, email address, telephone numbers, IP address or other unique identifier, account name and password, and other similar information.
- **Financial and insurance information:** Bank account information, financial information, source of income, investments, assets information, insurance, and other similar information.
- **Protected class information:** Age, military, or veteran status.
- **Commercial information:** Records of products purchased or considered, including consuming histories or tendencies.
- **Internet or other electronic activity information:** Device and browser type, your browsing and search history on our Site, and information regarding your interaction with our Site.
- **Educational information:** Information about your educational history, degrees, and credentials.

- **Professional information:** Name and location of current or past employers, professional qualifications, and information on your resume or CV, including positions you hold.
- **Audio and visual information:** Video of you captured on CCTV security cameras installed in our offices.
- **Inferences drawn from any of the Personal Information identified above.**

## B. Purposes for Collection of Personal Information

We use your Personal Information to provide you with information and services you request from us, to contact you from time to time, to provide you with news and other information about AITi USWM, to facilitate your participation in virtual or in-person meetings or conferences, to leverage such information for our internal business and marketing purposes. We may use Personal Information of applicants and employees to evaluate you or otherwise process your data for employment purposes.

Additionally, we use Personal Information, including about your use of our Site, to monitor or improve our Site; for internal business analysis; to prevent fraud as well as activities that violate our Terms of Service or that are illegal; and to protect our rights and the rights and safety of our users or others.

## C. Disclosure of Personal Information for Business Purposes in the Past 12 Months

The following chart describes the categories of Personal Information that we disclosed to third parties for a business purpose in the 12 months prior to the date of this Policy:

Categories of Clients' Personal Information	Categories of Third Parties with Which We Shared Personal Information for a Business Purpose
Personal identifiers: Name, address, email address, telephone numbers, IP address or other unique identifier, account name and password, and other similar information.	Service providers that provide customer relationship management (CRM) services; administer certain accounts; assist us in operating, analyzing, and displaying content on our website; provide analytics information; advertise or market our products; provide website hosting, webcast, and teleconference services; provide legal and accounting services; act as business partners subject to confidentiality obligations; provide IT and security support; and assist in reporting, auditing, and accounting as well as governmental authorities where required by law or otherwise appropriate.
Financial information: Bank account information, financial information, source of income, investments, assets information, insurance, and other similar information.	Service providers to administer various online accounts for you and perform transactions requested by you; and assist in reporting, auditing and accounting as well as governmental authorities where required by law or otherwise appropriate.
Internet or other electronic network activity information: Device and browser type, your browsing and search history on our Site, and information regarding your interaction with our Site.	Service providers that provide data security services and cloud-based data storage; host our Site and assist with other IT-related functions; provide website hosting, webcast and teleconference services; advertise and market our products; and provide analytics information as well as governmental authorities where required by law or otherwise appropriate.

Educational information: Information about your educational history, degrees, and credentials.	Recruiting partners; employment firms; online application providers; business partners subject to confidentiality obligations; and governmental authorities where required by law or otherwise appropriate.
Professional information: Name and location of current or past employers, professional qualifications, and information on your resume or CV, including positions you hold.	Recruiting partners; employment firms; online application providers; business partners subject to confidentiality obligations; and governmental authorities where required by law or otherwise appropriate.

#### D. Additional Information About How We May Share Personal Information

We may also share your Personal Information as required or permitted by law to comply with a subpoena or similar legal process or government request, or when we believe in good faith that disclosure is legally required or otherwise necessary to protect our rights and property or the rights, property, or safety of others, including to law enforcement agencies and judicial and regulatory authorities. We may also share your Personal Information with third parties to help detect and protect against fraud or data security vulnerabilities. And we may transfer your Personal Information to a third party in the event of a sale, merger, reorganization of our entity, or other restructuring. Additionally, we may share your information with our affiliates.

#### E. Online Data Collection

We have certain cookies on our Site, detailed below, that automatically collect some information about your use of our Site.

Cookies are small, sometimes encrypted text files that are stored on computer hard drives by websites that you visit. They are used to help users navigate websites efficiently as well as to provide information to the owner of the websites. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, please visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

When you visit our Site, we may place a “cookie” or other online tracking devices (e.g., web beacons) that recognizes you. The cookies and other tracking technologies may also collect information about your IP address or actions taken in connection with the Site. We may use cookies or similar tracking technologies to capture information about the use of our Site, including to improve your user experience. Accordingly, we may store and retrieve information on your device through the use of cookies and similar technologies.

We use Google Analytics to evaluate the use of our website. Google Analytics uses cookies and other identifiers to collect information, such as how often users visit a website, what pages they visit when they do so, and what other websites they visited prior to visiting a website. To learn more about how Google Analytics collects personal information, review [Google’s Privacy Policy](#).

### III. California Privacy Rights

If you are a California resident, you may have separate rights regarding your Personal Information, in accordance with California law. **Please note: the rights in this Section III do not apply to any Personal Information we maintain about clients of AITi USWM for purposes of financial products and services, who are covered by the GLBA and largely exempt from the California state law rights described below.**

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## A. California Consumer Privacy Act

The California Consumer Privacy Act (CCPA) gives California residents rights described below with respect to their Personal Information.

## B. Your Right to Request Disclosure of Information We Collect and Share About You

We are committed to ensuring that you know what Personal Information we collect. To that end, you can ask us for any or all of following types of information regarding the Personal Information we have collected about you in the 12 months prior to our receipt of your request:

- Specific pieces of Personal Information we have collected about you;
- Categories of Personal Information we have collected about you;
- Categories of sources from which such Personal Information was collected;
- Categories of Personal Information, if any, that the business sold or disclosed for a business purpose about the client;
- Categories of third parties to whom the Personal Information was sold or disclosed for a business purpose; and
- The business or commercial purpose for collecting or selling your Personal Information.

## C. Your Right to Request Deletion of Personal Information We Have Collected About You

Upon your request, we will delete the Personal Information we have collected about you, except for situations where the CCPA authorizes us to retain specific information, including when it is necessary for us to provide you with a good or service that you requested; perform a contract we entered into with you; maintain the functionality or security of our systems; or comply with or exercise rights provided by the law. The law also permits us to retain specific information for our exclusively internal use, but only in ways that are compatible with the context in which you provided the information to us or that are reasonably aligned with your expectations based on your relationship with us. We will act on your deletion request within the timeframes set forth below.

## D. We Do Not Sell Your Personal Information

We do not sell Personal Information as defined by the California Consumer Privacy Act ("CCPA"). Additionally, we do not knowingly sell the Personal Information of minors under the age of 16.

## E. Exercising Your Rights and How We Will Respond

To exercise any of the rights above or to ask a question, contact us at 855-741-6098 or [Compliance.USWM@alti-global.com](mailto:Compliance.USWM@alti-global.com).

For requests for access or deletion, we will first acknowledge receipt of your request within 10 business days of receipt of your request. We will provide a substantive response to your request as soon as we can, generally within 45 days from when we receive your request, although we may be allowed to take longer to process your request under certain circumstances. If we expect your request is going to take us longer than normal to fulfill, we will let you know.

We usually act on requests and provide information free of charge, but we may charge a reasonable fee to cover our administrative costs of providing the information in certain situations. In some cases, the law may allow us to refuse to act on certain requests. When this is the case, we will endeavor to provide you with an explanation as to why.

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## F. Our Commitment to Honoring Your Rights

If you exercise any of the rights explained in this Policy, we will continue to treat you fairly. If you exercise your rights under this Policy, you will not be denied or charged different prices or rates for goods or services or provided a different level or quality of goods or services than others.

## G. Verification of Identity – Access or Deletion Requests

We will ask you for identifying information and attempt to match it to information that we maintain about you.

If we are unable to verify your identity with the degree of certainty required, we will not be able to respond to your request. We will notify you to explain the basis of the denial.

## H. Ensuring Veracity of Opt-Out Requests

If we have a good-faith, reasonable belief that a request to opt-out of the sale of Personal Information is fraudulent, we may deny the request. Should this occur, we will inform you and explain why we believe the request is fraudulent.

## I. Authorized Agents

You may designate an agent to submit requests on your behalf. The agent must be a natural person or a business entity that is registered with the California Secretary of State.

If you would like to designate an agent to act on your behalf, you and the agent will be required to provide us with proof of the agent's identity and proof that you gave the agent signed permission to submit a request on your behalf. Additionally, you will be required to verify your identity by providing us with certain Personal Information as described above or provide us with written confirmation that you have authorized the agent to act on your behalf.

Please note that this subsection does not apply when an agent is authorized to act on your behalf pursuant to a valid power of attorney. Any such requests will be processed in accordance with California law pertaining to powers of attorney.

## J. Requests for Household Information

There may be some types of Personal Information that can be associated with a household (a group of people living together in a single dwelling). Requests for access or deletion of household Personal Information must be made by each member of the household. We will verify the identity of each member of the household using the verification criteria explained above and will also verify that each household member is currently a member of the household.

## K. California Shine the Light

California Civil Code Section 1798.83, also known as the "Shine the Light" law, permits California residents to annually request, free of charge, information about certain categories of Personal Information a business has disclosed to third parties for direct marketing purposes in the preceding calendar year. For information covered by this law, please reference the "contact us" section below.

## L. Minors

Our products and services are not directed to minors under the age of 13. We do not knowingly sell the Personal Information of minors under the age of 16.



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#### **IV. Personal Information of Minors**

Our products and services are not directed to minors under the age of 13. We do not knowingly collect the Personal Information of minors under the age of 13. If you are a parent or guardian and believe we may have collected information about your child, please contact us immediately as described in the “Contact Us” section below.

#### **V. Third-Party Websites**

Our Site may contain links to other third-party websites, which may have privacy policies that differ from our own. We are not responsible for the activities and practices that take place on these websites. Accordingly, we recommend that you review the privacy policies posted on any website that you may access through our Site.

#### **VI. Do Not Track**

Some browsers have a “do not track” feature that lets you tell websites that you do not want to have your online activities tracked. At this time, our Site does not respond to browsers’ do not track signals.

#### **VII. Contact Us**

If you have any questions or concerns about your Personal Information or this Policy, please contact us at 855-741-6098 or [Compliance.USWM@alti-global.com](mailto:Compliance.USWM@alti-global.com).