One Capital Management, LLC
CA Privacy Policy
April 2025

ONECAPITAL MANAGEMENT, LLC

CA Privacy Policy

***Note:** This CA Privacy Policy does not apply to One Capital Management, LLC and its affiliates (individually and collectively "OCM") job applicants, current employees, former employees or independent contractors located in California. For those individuals, please access our California Personnel Policy by visiting https://www.onecapital.com/legal.html and clicking the applicable link.

California Privacy Rights

This section applies to residents of California whose personal information is subject to the California Consumer Privacy Act ("CCPA"), as amended by the California Privacy Rights Act ("CPRA"). If you are not a resident of California, the rights described in this section do not apply to you.

Not all of the personal information we collect about certain California residents is subject to the CPRA because consumer or client personal information collected, processed, sold or disclosed pursuant to the Gramm-Leach-Bliley Act ("GLBA") is fully exempt from the CPRA. However, if OCM were to collect personal information about individuals who are not currently clients but could become clients in the future, that information would likely be subject to the consumer privacy rights outlined in the CRPA. This is because such an individual likely has not yet become a "consumer" or "customer" of OCM, as those terms are defined under the GLBA.

Data Handling

We may collect the following categories of personal information: (1) identifiers (for example: your name, postal address, unique personal identifiers and e-mail address); (2) internet usage information (for example, when you browse our website or otherwise interact with us online, we may collect information regarding such interactions); and (3) personal information categories listed in Cal. Civ. Code § 1798.80(e) (for example, your signature, physical characteristics or description, address or telephone number). We maintain physical, electronic, and procedural safeguards to protect this data and restrict access to this data to those employees who need to know that information to service your account.

Data Retention

The CCPA, as amended by the CPRA, prohibits businesses from retaining covered personal information for a longer time period than is necessary to achieve the disclosed purpose for its collection. We may retain each category of personal information described above as necessary for our legitimate business purposes. The criteria used to determine our retention periods generally include: the length of time we have an ongoing relationship with you; whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records of your transactions for a specific period of time before we can delete them); and whether retention is advisable considering our legal position (such as, for statutes of limitations, litigation or regulatory investigations).

Data Sharing

We do not "sell" your personal information to, or "share" your personal information with, third parties (as those terms are defined by the CCPA). Below is a summary of the categories of personal information that we may have disclosed for a business purpose in the previous 12 months and the categories of third parties to whom we may have disclosed it:

Categories of Personal Information Collected	Categories of 3rd Parties to Whom We Disclosed Personal Information for a Business Purpose
(1) Identifiers	- Service providers used to help carry out our business functions, such as financial institutions and other financial service providers, IT providers, analytics companies, outside legal counsel, and others; - Supervisory authorities, law enforcement and/or other regulators and regulatory bodies as required for legal compliance; and - Prospective and current advisory clients
(2) Internet Usage Info	- Service providers used to help carry out our business functions, such as financial institutions and other financial service providers, IT providers, analytics companies, outside legal counsel, and others; and - Supervisory authorities, law enforcement and/or other regulators and regulatory bodies as required for legal compliance
(3) Personal information categories listed in Cal. Civ. Code § 1798.80€	- Service providers used to help carry out our business functions, such as financial institutions and other financial service providers, IT providers, analytics companies, outside legal counsel, and others; and - Prospective and current advisory clients

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We do not knowingly "sell" or "share" (as defined by the CCPA) any personal information of children under 16 years of age.

Notice Requirements

The CPRA imposes two notice obligations on covered employers — (1) to post an online privacy policy and (2) to distribute a notice at collection of personal information. This CA Privacy Policy, posted online, serves to satisfy both of these requirements.

Notice at Collection

Under the CPRA, covered employers must distribute a notice to covered individuals at or before the point of collection of their personal information. The notice must explain the categories of personal information to be collected by the company and the purposes of use. In addition, covered employers also must provide notice about the handling of sensitive personal information, data retention, and the sale and sharing of personal information. OCM distributes this CA Privacy Policy to all individuals at or before the point of collection of their personal information in order to satisfy this notice requirement.

Rights Under the CPRA

Subject to certain legal limitations and applicable exceptions, residents of California may exercise the following rights:

Right to Know

You have the right to request that we disclose to you the categories of personal information we have collected about you; the categories of sources from which we collected the personal information; the purposes for collecting the personal information; the categories of third parties to whom we have disclosed your personal information; the categories of personal information disclosed for a business purpose and, for each, the categories of recipients, or that no disclosure occurred; and the categories of personal information about you sold, and for each, the categories of recipients, or that no sale occurred. You also have to right to request the specific personal information we have collected from or about you.

Right to Delete

You have the right to request that we delete all or a portion of your personal information that we have collected from you. Please note that in certain instances we may not be able to process your request, such as due to the existence of a legal obligation or pursuant to other permitted exceptions.

Right to Correct

You have the right to request that we correct inaccurate personal information that we maintain about you.

Exercising Those Rights

You may exercise your California privacy rights by either: (i) emailing us at compliance@onecapital.com or (ii) calling us at (805) 409-8150 and making a request. In accordance with applicable law, you have the right not to receive discriminatory treatment from us as a result of your exercising these rights.

You may request access to your personal information twice in any 12-month period, measured from the date we receive your first request. In order for us to process any of these requests, we will need to obtain certain information from you to verify your identity. Specifically, you must provide us with the following pieces of information: (i) full name; (ii) email address; and (iii) mailing address. You also must provide us with a signed declaration, under penalty of perjury, that you are who you say you are.

To the extent possible, we will use our existing authentication practices to verify your identity. Where necessary, we may request additional information about you so that we can verify your identity. Where we did not already hold that information, we will use it only for the purpose of verifying your identity and to process your request. We will make our best efforts to process these requests within 45 calendar days, unless we need more time, in which case we will notify you via email or phone.

Whenever you interact with us on behalf of another individual or entity, such as by providing or accessing personal information about another individual, you represent that your interactions and exchanges comply with the CPRA. You shall have sole responsibility for any violation of applicable laws as a result of a failure to obtain any necessary consent from such an individual or entity.