

Privacy Policy

This Privacy Policy (“**Policy**”) describes how SCP Real Assets, LLC (“SCP-RA”) and our affiliates (collectively, “**we**”, “**our**”, “**us**”) may collect, use, and disclose Personal Information that we obtain when you visit or interact with www.scprealassets.com, including its subdomains, and any of our websites that link to this Policy (collectively, the “**Site**”).

For information about how we process nonpublic personal information of our customers and consumers under the Gramm-Leach-Bliley Act, please see our [Financial Privacy Notice](#) at the end of this document. We may provide additional or separate privacy disclosure for certain services we provide.

Collection of Personal Information

“**Personal Information**” is information that identifies, relates to, describes, is reasonably capable of being associated with, linked, or may reasonably be linkable, directly or indirectly, to you. Personal Information includes “Personal Data” and “Sensitive Personal Information” as defined in applicable privacy law. Personal Information does not include information that is publicly available, identified, or aggregated.

Depending on how you interact with us, we or our vendors may obtain Personal Information directly from you (such as when you contact us, create an account, or make a purchase); automatically when you access or interact with our Site; or from our vendors or business partners. Personal Information we obtain may include the following:

- **Identifiers and personal records**, including your name, email address, postal address, telephone number, unique personal identifier, online identifier, Internet Protocol (IP) address, account name, payment information, date of birth, Social Security Number, driver’s license or state identification number, passport number, username and password, and any information you include in account authentication security questions (e.g., your mother’s maiden name), and billing and payment information.
- **Characteristics of protected classifications** under state or federal law, such as marital or familial status.
- **Commercial information**, including records of personal property; products or services purchased, obtained, or considered; or other purchasing or consuming histories or tendencies.
- **Internet or other electronic network activity information**, including, but not limited to, device identifiers, browser characteristics, operating system details, language preferences, referring URLs, length of visits, and pages viewed automatically using various tools and technologies such as cookies and web server logs.
- **Geolocation data**, including approximate location inferred from IP address.
- **Professional or employment-related information**, such as company name and industry.

We may combine your Personal Information with other information we obtain about you, which may include data we obtain from third parties. We reserve the right to convert, or permit others to convert, your Personal Information into deidentified or aggregated data, as permitted by law.

We may use Personal Information for the following purposes:

- **To provide the services you request**, such as operating and maintaining our business; providing information about our products and services; communicating with you about our products and services; responding to your requests; and processing your transactions.
- **To improve our business**, such as by facilitating and personalizing your user experience; making navigation on our Site easier; and assessing the performance of our products and services.
- **For quality, safety, and internal research**, such as monitoring and analyzing trends, usage, and activities of visitors and users of our Site; repairing or improving the quality of our Site; tracking and responding to quality and security issues; and developing new or enhanced products and service offerings.
- **For security and integrity**, such as protecting the Site from cyber risks; authenticating visitors to the Site; preventing, identifying, investigating, and responding to fraud, illegal or malicious activities, and other liabilities; enforcing our policies and terms; protecting our rights; fulfilling our legal obligations; and generally providing you with a secure experience when using the Site.
- **For advertising and marketing**, such as serving advertisements, sending marketing communications, and measuring the use of our Site and effectiveness of our advertising and marketing.
- **For legal compliance**, such as recordkeeping and auditing purposes; risk management, investigations, reporting and other legal and compliance reasons; complying with applicable laws, regulations, or legal process as well as industry standards and our company policies; and preventing, investigating, identifying, or taking any other action with regard to any suspected or actual fraudulent or illegal activity or any activity that violates our policies.
- **For business transactions**, such as identifying prospective customers, business clients, suppliers, and other vendors; and in connection with mergers, acquisitions, divestitures, or similar corporate transactions.
- **For any other purpose**, with your consent.

Disclosure of Personal Information

We may disclose your Personal Information, as described above, to the following types of parties:

- **Our group of companies**, including with our affiliates and subsidiaries for our business purposes.
- **Agents, vendors, consultants, and other service providers** that provide services on our behalf and help us operate our business and the Site, such as for website maintenance or customer service purposes, operate and improve our business and the Site, improve our products and customer service, help run our promotions, process payments, perform auditing and quality control, communicate with you, and otherwise operate our business.
- **Business partners** to provide services you have requested and to otherwise operate our business.
- **Advertising partners** for the purposes of ad targeting, remarketing, and customized advertising content.
- **Insurers, auditors, and other professional advisers** for the purposes of managing risks, exercising or defending against legal claims, and otherwise obtaining professional advice.

- **Third parties** in the event of a business transaction, such as if we sell or transfer all or a portion of our business or assets (e.g., further to a merger, reorganization, liquidation, bankruptcy, or any other business transaction, including negotiations of such transactions).
- **Law enforcement, government or regulatory bodies, or other authorized parties** when required by subpoena, search warrant, or other legal processes; to assist in investigations; to protect and defend our rights and property or the rights or safety of other parties; or in response to activities that are unlawful or a violation of our Terms of Use, this Policy, or agreements with third parties; to protect and defend our rights or property; or for crime-prevention purposes.

Cookies and Other Similar Tracking Technologies

We and our vendors may use cookies, pixels, SDKs, and other similar online tracking technologies (collectively, “**Cookies**”) to collect information when you interact with the Site. These Cookies may collect usage information (such as the browser you are using, IP address and device identifier, length and time of visit, and pages visited); general geolocation data (to deliver content based on your location); and details about how you interact with the Site (including clicks, cursor movement, scrolls, and keystroke activity).

This information is used by us and our vendors for a variety of purposes, including to store your preferences and settings, enable you to sign in, analyze how the Site perform, track your interactions with the Site, deliver and tailor interest-based advertisements, develop inferences about you, combat fraud, and to fulfill other business purposes.

We may engage certain web analytics services (including Google Analytics) to help us understand and analyze how visitors use the Site, help us administer and improve the quality of the Site, and serve ads on our behalf across the Internet. We’ve implemented Google Analytics Advertising Features such as remarketing with analytics, interest-based advertising, demographics and interests reporting, user segment analysis, and impression reporting. For more information on how Google Analytics uses data collected through the Site, visit support.google.com/analytics/answer/6004245. You may also be able to opt out of Google Analytics by visiting tools.google.com/dlpage/gaoptout.

You may be able to manage your Cookie preferences, including to opt out of certain interest-based advertising, using the settings on your browser or mobile device. In addition, the following services or organizations offer tools that you can use to limit or opt out of interest-based advertising:

- **Google:** To adjust your Google advertising settings, visit myadcenter.google.com.
- **Industry organizations.** To opt out of interest-based advertising from companies that participate in the Digital Advertising Alliance or Network Advertising Initiative opt out programs, please visit youradchoices.com/control and optout.networkadvertising.org.
- **Do Not Track Signals.** Your web browser may have settings that allow you to transmit a “Do Not Track” signal when you visit various websites or use online services. Like many websites, the Site are not designed to respond to “Do Not Track” signals received from browsers. To learn more about “Do Not Track” signals, visit allaboutdnt.com.

Your opt out choice may apply only to the browser or device you are using when you opt out, so you should update your settings on each of your browsers and devices. If you opt out, you will still receive ads, but they may not be as relevant to you and your interests. Note that opting out of these types of technologies may result in certain online features not functioning properly.



We do not control how third parties manage their opt out processes. We are not responsible for the effectiveness of external parties opt out options or programs, or the accuracy of their statements regarding their programs.

We or our vendors may collect Personal Information about your online activities over time and across different devices and online properties when you use the Site.

External Links

Our Site may include links to other websites that are owned and/or operated by third parties. This Policy does not apply to those websites which may have their own privacy policies or notices that you should review to understand how they may use or disclose your Personal Information. We are not responsible for the content or privacy practices of any linked websites that we do not control.

Our Site also may provide links to other websites operated by us or our subsidiaries, brands, or affiliates. Unless indicated otherwise, these websites are not governed by this Policy; we encourage you to review the privacy policies posted on these linked websites.

Security

We take reasonable measures to protect your Personal Information from loss, theft, misuse, unauthorized access, disclosure, alteration, and destruction. Nevertheless, transmission via the Internet and online digital storage are not completely secure, so we cannot guarantee the security of your Personal Information collected through our Site.

Your Choices

Accessing, reviewing, and changing your Personal Information: Registered users can review and change certain Personal Information (e.g., email address, postal address, telephone number, password, payment information) at any time by accessing their account on the Site.

Email marketing: You may opt out of email marketing communications at any time by clicking the “unsubscribe” link in the body of the email. Opting out of marketing emails will not affect our administrative emails to you (e.g., emails about your transactions or messages related to your account). Unsubscribing from our marketing communications will not affect the level or quality of service we provide to you.

State Privacy Disclosures

This section applies to Personal Information we collect and otherwise process from residents of states with comprehensive privacy laws applicable to us, including the **California Consumer Privacy Act (“CCPA”)** (collectively, “**Applicable States**”).

In the event of a conflict between this section and the Policy, this section will govern Applicable State residents’ privacy rights.

We may obtain the Personal Information listed in the “Collection of Personal Information” from sources other than the Site, including offline sources. In addition, we may collect the following Personal Information from online and offline sources:

- **Audio, Electronic, Visual, or Similar Information**, including audio recordings of customer service calls or video recordings of online meetings.
- **Inferences** drawn from any of the above categories of Personal Information to create a profile about a consumer reflecting the consumer’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

We may use and disclose the above types of Personal Information as described in the “Use of Personal Information” and “Disclosure of Personal Information” sections above.

Selling and Sharing for Targeted Advertising

Under certain Applicable State privacy laws, a “sale” of Personal Information does not necessarily involve an exchange of money but also includes the disclosure of Personal Information to third parties that may use the information for their own purposes, such as Cookie or other advertising technology providers. We do not sell Personal Information for monetary consideration, but we may share Personal Information for targeted and cross-context behavioral advertising (“**Targeted Advertising**”). We may sell or share for Targeted Advertising the following categories of Personal Information: Identifiers, Internet or Other Electronic Network Activity, Geolocation Data, and Inferences. We sell and/or share this Personal Information with advertising and analytics vendors for advertising purposes.

We do not have actual knowledge that we sell or share the Personal Information of consumers under sixteen (16) years of age.

Your Privacy Rights

If you are a resident of an Applicable State, you may have certain rights regarding your Personal Information, as described further in this section.

To submit a request, please email us at privacy@scprealassets.com. Please note that we may request additional Personal Information to verify your identity. You may be able to designate an authorized agent to make a request on your behalf; however, you will still need to verify your identity directly with us before your request can be processed.

- **Right to Confirm and Access.** You may have the right to confirm that we process your Personal Information, know details about the Personal Information we process, and access your Personal Information. California residents may also request:
 - The categories of sources from which the Personal Information was collected.
 - Our purposes for collecting, selling, sharing, or disclosing Personal Information.
 - The categories of recipients to which we disclose Personal Information.
 - The categories of Personal Information that we sold or shared, and for each category identified, the categories of third parties to which we sold or shared that particular category of Personal Information.

- The categories of Personal Information that we disclosed for a business purpose, and for each category identified, the categories of recipients to which we disclosed that particular category of Personal Information.
- **Right to Correct.** You may request that we correct inaccuracies in your Personal Information, taking into account the nature of the Personal Information and our purposes for processing it.
- **Right to Delete.** You may request that we delete your Personal Information.
- **Right to Opt Out of Sales and Targeted Advertising.** You may request to opt out of sales and/or Targeted Advertising by enabling Global Privacy Control (“**GPC**”) opt-out preference signals. Please note that if you choose to use the GPC browser signal, you will only be opted out of online sales and sharing for Targeted Advertising and will need to turn it on for each browser you use. Please also see the section on “Cookies and Other Similar Tracking Technologies” for more information about third-party opt out tools. To opt out of sales and Targeted Advertising that do not use Cookies, please email us at privacy@scprealassets.com.

We do not use Personal Information for profiling or automated decision-making in furtherance of decisions that produce legal or similarly significant effects.

We will comply with your request as soon as reasonably practicable, in accordance with applicable legal requirements. We will not discriminate against you for choosing to exercise any of your privacy rights.

Additional California Disclosures

This section applies to residents of California. Unless otherwise noted, the disclosures contained within this section cover our activities in the prior twelve (12) months from the Effective Date as well as our current practices.

Job Applicants

If you apply for a job with us, we also use your Personal Information to facilitate our recruitment and hiring process, including opening and maintaining your applicant record; assessing your eligibility for employment; communicating with you regarding your application and the recruitment process; confirming your right to work; and making any accommodations. In addition to the parties identified in the “Disclosure of Personal Information” section above, we may also disclose Personal Information we process for recruiting with your references and our verification providers.

Sensitive Personal Information

Some of the Personal Information we collect is considered Sensitive Personal Information under the CCPA, including a consumer’s: social security, driver’s license, state identification card, or passport number; and precise geolocation.

We do not use or disclose Sensitive Personal Information for purposes to which the right to limit use and disclosure applies under the CCPA.

Data Retention

Except as otherwise permitted or required by applicable law or regulation, we will only retain your Personal Information for as long as necessary to fulfill the purposes we collected it for, as required to satisfy any legal obligations, or as necessary to resolve disputes. To determine the appropriate retention period for



Personal Information, we consider applicable legal requirements; the amount, nature, and sensitivity of the Personal Information; the potential risk of harm from unauthorized use or disclosure of your Personal Information; the purposes for which we process your Personal Information; and whether we can achieve those purposes through other means.

California's "Shine The Light" Law

California law permits customers in California to request certain details about how their Personal Information is shared with third parties and, in some cases, affiliates if that Personal Information is shared for those third parties' and affiliates' own direct marketing purposes. Californian customers may request such information by contacting us at the contact information provided at the end of this Policy.

To make a request, please provide sufficient information for us to determine if this applies to you, attest to the fact that you are a California resident, and provide your current California address to which we will send our response. Your inquiry must specify "California Privacy Rights Request" in the subject line of the email and include your name, street address, city, state, and ZIP code. Please note that we are only required to respond to one request per customer each year.

Additional Information for Users Outside the United States

If you are accessing the Site from outside the United States, please be aware that information we obtain about you will be processed in the United States or in other jurisdictions. By using the Site, you acknowledge your Personal Information may be transferred to and processed in jurisdictions outside your own, as described in this Policy. Please be aware that the data protection laws and regulations that apply to your Personal Information transferred to the United States or other countries may be different from the laws in your country of residence.

Updates

This Policy is subject to change at our discretion without notice to you. We will indicate changes, including material changes, to the Policy by updating the "Last Updated" at the top of this Policy. Your continued use of our Site after any update to this Policy will constitute your acceptance of the changes.

Contact Information

For more information, you may email us at privacy@scprealassets.com

Financial Privacy Notice

FACTS	WHAT DOES SCP REAL ASSETS, LLC (“SCP-RA”) DO WITH YOUR PERSONAL INFORMATION?
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Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
What?	<p>The types of personal information we collect, and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> ▪ Social Security number and assets ▪ Checking account information and wire transfer instructions ▪ Account transactions
How?	All financial companies need to share customers’ personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers’ personal information; the reasons SCP-RA chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does SCP-RA share?	Can you limit this sharing?
For our everyday business purposes — such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes — to offer our products and services to you	Yes	No
For joint marketing with other financial companies	No	We don’t share
For our affiliates’ everyday business purposes — information about your transactions and experiences	Yes	No
For our affiliates’ everyday business purposes — information about your creditworthiness	No	We don’t share
For our affiliates to market to you	No	We don’t share
For nonaffiliates to market to you	No	We don’t share

<p>To limit our sharing</p>	<p>Email us at privacy@scprealassets.com.</p> <p>Please note:</p> <p>If you are a <i>new</i> customer, we can begin sharing your information immediately. When you are <i>no longer</i> our customer, we continue to share your information as described in this notice.</p> <p>However, you can contact us at any time to limit our sharing.</p>
<p>Questions?</p>	<p>Go to www.scprealassets.com.</p>

<p>Who we are</p>	
<p>Who is providing this notice</p>	<p>This notice is being provided on behalf of SCP Real Assets, LLC.</p>
<p>What we do</p>	
<p>How does SCP-RA protect my personal information?</p>	<p>To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secure files and buildings.</p>
<p>How does SCP-RA collect my personal information?</p>	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> ▪ Open an account or deposit money ▪ Show your government-issued ID ▪ Make a wire transfer or pay us via check <p>We also collect your personal information from others, such as affiliates or other companies.</p>
<p>Why can't I limit all sharing?</p>	<p>Federal law gives you the right to limit only:</p> <ul style="list-style-type: none"> ▪ Sharing for affiliates' everyday business purposes—information about your creditworthiness ▪ Affiliates from using your information to market to you ▪ Sharing for nonaffiliates to market to you

	State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.
What happens when I limit sharing for an account I hold jointly with someone else?	Your choices will apply to everyone on your account.

Definitions	
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> Our affiliates include financial companies such as Gold Bullion International, LLC; Greylock Peak Investments, LLC d/b/a Wealthion and SCP Resource Finance, L.P..
Nonaffiliates	Companies not related by common ownership or control. They can be financial and non-financial companies. <ul style="list-style-type: none"> SCP-RA does not share with nonaffiliates so they can market to you.
Joint marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. <ul style="list-style-type: none"> SCP-RA does not jointly market.

Other important information
<p>For California Customers: California residents are provided a California Notice for additional choices.</p> <p>For Vermont Customers. We will not disclose information about your creditworthiness to our affiliates and will not disclose your personal information, financial information, or credit report, or health information to nonaffiliated third parties to market to you, other than as permitted by Vermont law, unless you authorize us to make those disclosures. Additional information concerning our privacy policies can be found at www.scprealassets.com.</p>