

Privacy Policy

Last updated: March 15, 2023

Lewis & Clark Partners, LLC and its affiliates (“Lewis & Clark”, “we”, or “us”) are committed to protecting the privacy of personal information of individuals who visit lacpartners.com and all other websites owned or operated by Lewis & Clark and inquire or use the services associated with our business, including advisory services, available through our Site (the “Services”). This Privacy Policy discloses the privacy practices for Lewis & Clark and for its Site, including the type of personal collected and tracked, how the information is used, and with whom the information is shared.

By accessing or using the Site, you consent to our activities and practices regarding your information as described in this Privacy Policy. Please carefully review this Privacy Policy, and if you do not agree with any part of this Privacy Policy, your sole and exclusive remedy is to discontinue your use of the Site.

We may amend, modify, update, supplement or remove portions of this Privacy Policy in our sole discretion, from time to time, and will provide notice of any changes using the last updated date above. Your use of the Site following any such changes constitutes your acceptance and agreement to the updated terms.

Information We Collect

In order to provide you with the Services, it is necessary for us to possess some of your personal information. Moreover, personal information may be collected incident to your use of the Site. “Personal information” is information that can personally identify you, such as your name, email address, or telephone number. Personal information also includes any other identifier that permits the identification of a specific individual. The data we collect depends on the context of your interactions with Lewis & Clark, the choices you make, and the features you use on the Site. The following describes the types personal information we may collect:

- Any contact details you provide, such as your name, address, Social Security number (SSN), date of birth, email address, and company name;
- Payment and financial information, such as your income, assets, investment preferences, investment experience, and transaction history;

Username, passwords, and account information such as purchase, sales, account balances, and inquiries; and

- Information to process transactions or to conduct online transactions, including wire transfer instructions.
- Information about the browsers and devices you use to access the Site, including unique identifiers. Unique identifiers are cookie files used to uniquely identify a browser or device. Please see the section below on “Cookies” for more information.
- Your Internet Protocol (IP) address whenever you access the Site, which is a number automatically assigned to your computer or device when you browse the internet. These numbers are usually assigned based on geography, so an IP address can often be used to identify the general geographic

area of where a device is connecting to the internet. We may use your IP address to administer and address technical issues with the Site. You may be able to disallow certain location data through your device or browser settings.

- Information about how your browsers and devices interact with the Site, including crash reports, system activity, and the date, time and referrer URL (the webpage you came from if you clicked a link to access the Site). We may also collect statistical information about visitor activity on the Site, including web traffic, and the date, time, duration and number of visits.

“Cookies” are small pieces of data (text files) that are stored in the web browser on your device in order to remember information about you. Cookies are used to compile anonymous, aggregate statistics-based information collected through the Site. We may use cookies to administer and operate the Site, including site configuration and IT security. If you prefer, you can refuse the use of cookies by selecting the appropriate browser setting. If you opt-out, please note that your experience using the Sites may not be optimal, and you may not be able to use certain features on our Sites. For information on how to remove or manage cookie functions and adjust your privacy and security preferences, access the “help” menu on your internet browser, or visit <http://www.aboutcookies.org/how-to-control-cookies>. By visiting our Sites, you agree to our use of cookies.

How Information is Collected

We collect your information through various means, including, for example, any messages, content, feedback and other submissions you provide through the Site or to Lewis & Clark directly incident to our Services. If needed, we may obtain your personal information from other parties, such as our affiliates or other non-affiliated companies that are authorized to share your information with us. We may also obtain information from third parties to verify your identity, including personal and credit information from consumer reporting agencies, or information from other companies about contracts or accounts transferred to us. Additionally, to promote protection of your identity, we also may collect credit or identity information which we use to help prevent and detect fraud.

Purposes for Collecting Your Personal Information

You may provide your personal information to Lewis & Clark in order to fulfill a Service. We request your personal information for a variety of purposes throughout your interaction with Lewis & Clark, some of which are listed below:

- Contacting you or your designated representative by phone, email, fax, or mail;
- Providing you or your representative with communications related to our products and Services;
- Providing you with our Services;
- Opening and managing your account with us;
- Sharing information about our Services including investment research;
- Facilitating and processing financial transactions related to your account;
- Fulfilling our legal and regulatory obligations, including to respond to court orders and legal investigations; or

- Any other purpose of which you have been notified, or has been agreed, in writing.

Legal Basis for Using Your Personal Information

There is a need to process, obtain, and store personal information for the purposes set out in this Privacy Policy as a matter of contractual necessity under or in connection with your agreement(s) with us, and in the legitimate interests of Lewis & Clark to operate its business. From time to time, Lewis & Clark may need to process, obtain, and store your personal information on other legal bases, including:

- To fulfil its obligations it has under a contract we have with you or to enter into a contract with you;
- To comply with a legal obligation, for example, where we are required to report to tax authorities;
- If necessary, for a task carried out in the public interest;
- If necessary, to protect the vital interests of a client or other data subjects; or
- To provide services to our clients, provided our use is proportionate and respects your privacy rights.

A failure to provide the personal information required or requested to fulfil the purposes described in this Privacy Policy, may result in Lewis & Clark being unable to offer you with its Services or being unable to provide the Services in connection with the terms of your agreement(s) with us.

Restricted Use Regarding Minors

This Site is not intended or designed to be used by children under the age of 13. We do not collect personal information from any person we know to be under the age of 13 and instruct children under 13 not to send us any information.

Disclosure to Others

We may provide your personal information to our affiliates and to firms that assist us in servicing your account and/or otherwise providing you with our Services and have a need for such information, such as a broker, custodian, money manager or fund administrator. We may also disclose such information to service providers and financial institutions with whom we have joint marketing arrangements (*i.e.*, a formal agreement between nonaffiliated financial companies that together market financial products or services to you, such as placement agents). We require third-party service providers and financial institutions with which we have joint marketing arrangements to protect the confidentiality of your information and to use the information only for the purposes for which we disclose the information to them. We may also share your information with agencies and organizations working to prevent fraud in financial services and with our regulators to comply with all applicable laws, regulations and rules, and requests of law enforcement, regulatory and other governmental agencies. Moreover, we may share your personal information with our attorneys, accountants, and auditors. If you either terminate our services or become an inactive customer, we will continue to adhere to our Privacy Policy, as may be amended from time to time.

Opting Out of Third-Party Disclosures

If you prefer that Lewis & Clark not disclose the nonpublic personal information about you to non-affiliated third parties, you may opt of such disclosures – that is, you may direct us to not make those disclosures, other than those permitted by law. If you wish to so opt out, you may contact our Compliance Department at info@lacpartners.com, or send a written request to the firm address: 120 S. Central Ave. Ste. 1000, St. Louis, MO 63105 Attn: Compliance Dept.

Safeguarding Your Personal Information

To protect your personal information from unauthorized access and use, we maintain physical, electronic, and procedural security measures that comply with applicable legal and regulatory standards to safeguard your personal information designed to: (i) maintain the security and confidentiality; (ii) protect against any anticipated threats or hazards to the security or integrity; (iii) protect against unauthorized access to or use of such information that could result in substantial harm, and (iv) ensure appropriate disposal of such information.

We train our employees to keep your information safe and confidential. We follow generally accepted standards to protect the personal information you submit to us, whether that information is in transit or at rest. No method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, we cannot guarantee its absolute security.

Data Storage and Retention

We will store and retain your personal information only for as long as is reasonably necessary to fulfil purposes for which it was collected and processed, as explained in this Privacy Policy. In some circumstances we may store your personal information for longer periods of time, where we are required to do so in accordance with legal, regulatory, tax, accounting, or necessary technical requirements. In specific circumstances we may store your personal information for longer periods of time, if we reasonably believe there is a prospect of litigation relating to your personal information or dealings.

The following applies only to residents of the State of California:

PII Rights for California Residents

The California Consumer Privacy Act (“CCPA”) requires us to make certain additional disclosures and provides California residents with the ability to request additional information about their personal information. If you are a California resident and it is determined that the CCPA applies to you, this section details those rights, how you may exercise them, and what Lewis & Clark will do in response.

Please note that the rights under the CCPA do not apply to personal information collected, processed, sold or disclosed pursuant to Gramm-Leach-Bliley Act (Public Law 106-102) and Fair Credit Reporting Act (12 CFR 1022).

If you are an individual who resides in California and whose personal information is collected and processed by Lewis & Clark, you may have the right to:

- Request that we disclose, free of charge, the categories and specifics of the personal information we collect about California residents, the sources from which the personal information was

collected (and/or, if applicable, sell or otherwise disclose to a third party), and the business purpose for collecting personal information.

- Choose to opt-out of the sale of personal information. Currently, however, Lewis & Clark does not sell personal information.
- Request that we delete the personal information we have collected. Following our verification of the request, we will comply with the request and delete any or all the personal information in our possession that we collected from the California resident and/or any or all such personal information in the possession of our service providers, unless otherwise restricted by law or regulation.

Legal Rights Available

You have certain rights in relation to your personal information. You can then exercise your rights by using the contact details below.

- Right to Access Personal Information
You have a right to request that we provide you with a copy of your personal information that we hold.
- Right to Rectify or Erase Personal Information
You have a right to request that we rectify inaccurate personal information. You can also request that we erase your personal information in limited circumstances where: it is no longer needed for the purposes for which it was collected; or you have withdrawn your consent (where the data processing was based on consent); or following a successful right to object (see right to object); or it has been processed unlawfully; or to comply with a legal obligation to which Lewis & Clark is subject.

We are not required to comply with your request to erase personal information if the processing of your personal information is necessary: for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims.

- Right to Restrict the Processing of Your Personal Information
You can ask us to restrict your personal information, but only where: its accuracy is contested, to allow us to verify its accuracy; or the processing is unlawful, but you do not want it erased; or it is no longer needed for the purposes for which it was collected, but we still need it to establish, exercise or defend legal claims; or you have exercised the right to object and we are considering your request.

We can continue to use your personal information following a request for restriction: where we have your consent; or to establish, exercise or defend legal claims; or to protect the rights of another natural or legal person. Moreover, Federal law gives our clients the right to limit some but not all sharing. In general, you may not limit our use of your personal information unless the above mentioned conditions are satisfied, We note that the Federal privacy laws only give you the right to limit the certain types of information sharing that we do not engage in (*e.g.*, sharing with our

affiliates certain information relating to your transaction history or creditworthiness for their use in marketing to you, or sharing any personal information with non-affiliates for them to market to you).

- **Right to Transfer Your Personal Information**
You can ask us to provide your personal information to you in a structured, commonly used, machine-readable format, or you can ask to have it transferred directly to another data controller, but in each case only where: the processing is based on your consent or on the performance of a contract with you; and the processing is carried out by automated means.
- **Right to Object to the Processing of Your Personal Information**
You can object to any processing of your personal information which has our legitimate interests as its legal basis, if you believe your fundamental rights and freedoms outweigh our legitimate interests. If you raise an objection, we have an opportunity to demonstrate that we have compelling legitimate interests which override your rights and freedoms.
- **Right to Withdraw Consent**
Where processing is based on your consent, you have the right to withdraw such consent at any time, provided that this doesn't affect the lawfulness of processing based on such consent.
- **Right to Obtain a Copy of Personal Information Safeguards Used for Transfers Outside Your Jurisdiction**
You can ask to obtain a copy of, or reference to, the safeguards under which your personal information is transferred outside of the European Union.
- **Right to Lodge a Complaint with Your Local Supervisory Authority**
You have a right to lodge a complaint with your local data protection supervisory authority if you have concerns about how we are processing your personal information. We ask that you please attempt to resolve any issues with us first, although you have a right to contact your supervisory authority at any time.

Authorized Agent

You have the right to appoint an authorized agent to exercise your rights on your behalf. If you would like to do so, please contact info@lacpartners.com.

Accessibility Information

For consumers with disabilities who need to access this Privacy Policy in an alternative format, please contact: info@lacpartners.com

Entities Providing this Privacy Policy

This Privacy Policy relates to the following entities and their affiliates:

- Lewis & Clark Partners, LLC
- Lewis & Clark AgriFood GP, LLC
- Lewis & Clark Venture Capital, LLC

Contact Us

If you have any questions, concerns or complaints regarding the information in this Privacy Policy and the data protection laws, or if you wish to exercise your rights set forth in this Privacy Policy, please contact us at info@lacpartners.com or through the contact information listed below. Please include a description of what right you want to exercise and the information to which your request relates.

Lewis & Clark Partners, LLC
120 S. Central Ave. Ste. 1000
St. Louis, MO 63105
Attn: Compliance Dept