

# Stone Ridge Asset Management LLC

## CCPA Privacy Notice

**Effective date:** January 1, 2020

Stone Ridge Asset Management LLC (“**Stone Ridge**,” “**we**,” “**us**” or “**our**”) values your privacy. This Privacy Notice describes how we may collect, use, share and otherwise process any personal information relating to a resident of California that we collect, as described below.

Some regulators such as the Securities and Exchange Commission and the Federal Trade Commission have adopted rules that require financial institutions, like Stone Ridge, to provide privacy policy notices to their clients. If you are a natural person who invests with us, that notice, available here, will govern how we use your personal data. Additionally, this Privacy Notice does not apply to employees, applicants for employment, contractors or business contacts.

### **I. Personal information we collect**

“Personal information” is any kind of information that allows us to identify you, directly or indirectly, such as your name, contact details or address. We may collect and process the following personal information about you:

- Identifiers, such as your name, address, email address and telephone numbers;
- Professional or employment information, such as your job title and place of work;
- Commercial information, such as payment history;
- Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)), including financial information;
- Internet or other electronic network activity information, such as your internet protocol (IP) address, login data, unique device identifiers, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, mobile device carrier and other technology on the devices you use to access this website; as well as usage information, such as information about how you use the website and our products and services, referring/exit web pages, date/time stamps, error logs, and the frequency of your use of the website;
- Inferences drawn from other personal information; and
- Marketing and communications information, such as your preferences in receiving marketing communications from us.

We also collect, use and share aggregated information such as statistical or demographic data for any purpose. This information could be derived from your personal information but will not directly or indirectly reveal your identity. For example, we may aggregate your usage information to calculate the percentage of users accessing a specific feature on this website. However, if we combine or connect information with your personal information so that it can directly or indirectly identify you, we treat the combined information as personal information which will be used in accordance with this Privacy Notice.

### **II. How we collect your personal information**

We collect personal information from you via the following:

#### **1. Personal information you provide to us**

- Forms you complete (or that are completed by your authorized representatives on your behalf); and
- Your correspondence and interactions with us, including by letter, email and telephone.

## **2. Personal information collected from third parties**

We may collect personal information about you from third parties, such as business partners, vendors or from publicly available information. The conditions under which we may obtain such information are governed by the third-party source.

## **3. Information collected automatically**

We may automatically collect certain information about the devices you use to access this website, as well as information on how you interact with this website, through cookies, web server logs, and other similar tracking technologies.

### **a) Cookies and other data collection technologies**

We may collect information about your use of this website through cookies, web server logs and other similar tracking technologies.

“Cookies” are a feature of web browser software that allows web servers to recognize the computer used to access a website. They are small text files that are stored by a user’s web browser on the user’s hard drive. Cookies can remember what information a user accesses on one website to simplify subsequent interactions with that site by the same user or to use the information to streamline the user’s transactions on related websites. A number of cookies we use last only for the duration of your web session and expire when you close your browser. Other cookies last longer and are used to recognize your computer when you return to the website. Cookies are designed to make your online experience easier and more personalized. They can only be read by the server that placed them, and are unable to execute any code or virus.

Web server logs are files that store the activity on a certain website.

Information gathered through cookies and web server logs may include information such as the date and time of visits to the website, the pages viewed, time spent at the website and the websites visited just before and just after the website. We use cookies and web server logs to manage your login session, help you move between websites in a smooth and secure manner and to gather information about the browsing activities of users of the website in order to continually improve it and better serve the needs of its users. We do not link cookies to personally identifiable information.

You can change your browser settings to notify you of the cookies being set or updated and to block cookies. Please note that if you have turned off all cookies, some features of the website may not be available to you or otherwise function as intended.

We also may include tracking pixels and web beacons in email messages, newsletters and other electronic communication. They help us to determine whether a message has been opened and to analyze and personalize our interactions with you. Instructions on how to unsubscribe are included in each email.

### **a) Cookie management**

We use the following categories of cookies on the Site. Most web browsers automatically accept cookies. You can, however, change your browser to prevent this or to notify you each time a cookie is set. To learn more about how to manage cookies on different types of browsers, you can visit the website [www.allaboutcookies.org](http://www.allaboutcookies.org).

- **Essential cookies:** These cookies are necessary for the function of the website and cannot be switched off by us. They do not store any personally identifiable information. While you can set

your browser to block or alert you about these cookies, some parts of the website will not work if you do so.

- **Performance, functionality and customization cookies:** These cookies improve the performance and functionality of the website, but are not essential to its use. Without these cookies, the website and its functions might be more cumbersome to load or navigate, but are still available. The information these cookies collect is aggregated and thus anonymous. This information is solely used for internal purposes in managing the website and improving its functionality. If you do not allow these cookies, we will not be able to monitor the performance of the website, and some of its services may not function properly.
- **Analytics cookies:** These cookies collect anonymous information that helps us understand how you use our services and to customize the website and our services for you. The functionality of the website is not impacted by the rejection of such cookies. We may use third-party analytics providers such as Google Analytics to collect and analyze usage of the website. You can prevent Google Analytics from using your information by downloading and installing the Google Analytics Opt-out Browser Add-on (<https://tools.google.com/dlpage/gaoptout>).
- **Targeting cookies:** These cookies record your visit to the website, the pages you have visited and the links you have followed. They recognize you as a previous visitor and track your activity on the website as well as other websites you visit. The functionality of the website is not impacted by the rejection of such cookies. These cookies may be set by our advertising partners and used to build a profile of your interests and show you relevant advertisements on other sites. Targeting cookies do not directly store personal information, but are based on uniquely identifying your browser and internet device. If you do not allow these cookies, you will experience less targeted advertising.

#### c) “Do Not Track” Browser Settings

We do not currently use technology that recognizes “do not track” signals from your web browser.

### III. How we use your personal information

We will only use your personal information when the law allows us to. Any of the information we collect from you may be used in one of the following ways:

- Where the processing is necessary for us to perform services we have been contracted to perform or to take steps prior to entering into a contract – for example, to provide information you have requested or to respond to your questions;
- Where necessary for the purposes of the Company’s legitimate business interests, including to operate and facilitate our business and services, communicate with you, undertake business management, planning, statistical analysis, market research and marketing activities, administer and maintain the Company’s core records, protect the Company’s rights and interests, ensure the security of the Company’s assets, systems and networks, prevent, detect and investigate fraud, unlawful or criminal activities in relation to our services and enforce our terms and conditions;
- Where required by applicable laws and regulations, including laws relating to know-your-client requirements, tax, the prevention of money laundering, fraud, terrorist financing and sanctions; and
- Where the processing is necessary for the establishment, exercise or defense of legal claims.

### IV. When we disclose your personal information

We do not disclose personal information except as may be required or permitted by law, rule or regulation. We do not disclose any personal information to anyone other than our affiliates, service providers and relevant counterparties without your consent, or as required by applicable law or regulation. This means that we may disclose your personal information described above to other third parties for a business purpose, including:

- Any governmental agency, regulatory authority or self-regulatory organization having jurisdiction over the Company, if (i) the Company determines that such disclosure is necessary or advisable pursuant to or in connection with any U.S. federal, state or local, or non-U.S., law, rule, regulation, executive order or policy, including without limitation any anti-money laundering law and the USA PATRIOT Act and (ii) such disclosure is not otherwise prohibited by law, rule, regulation, executive order or policy;
- Persons acting in a fiduciary or representative capacity on behalf of an investor, such as an IRA custodian or trustee of a grantor trust; and
- Certain other persons to the extent authorized by you.

We do not sell personal information obtained about you to any third parties, and have not done so in the twelve (12) months preceding the effective date of this policy.

#### **V. Third-party links**

The website may contain links to third-party websites, products and services. These third-party websites and services may have separate and independent privacy policies, which we encourage you to read. We have no responsibility or liability for the content and activities of such linked sites.

#### **VI. Children's Privacy**

The website is not directed toward children under the age of 18. We do not promote our products or services online to minors, and we do not intentionally collect any personally identifiable information from any person under 18.

#### **VII. Security**

We have implemented measures to help protect personal data from loss, misuse or unauthorized access or disclosure. While we strive to protect personal data, we cannot guarantee its security.

#### **VII. Privacy rights**

If you believe that we are processing personal information about you and wish to have access to that information, we can provide you with that data or an explanation of why we cannot do so in the particular context. Individuals in Andorra, Argentina, Australia, California, Canada, Europe, Faroe Islands, Guernsey, Hong Kong, Israel, Isle of Man, Japan, Jersey, Mexico, New Zealand, Singapore, South Korea, Switzerland, the United Kingdom, Uruguay and certain other jurisdictions may have certain data subject rights. These rights vary, but they may include the right to: (i) request access to and rectification or erasure of their personal data; (ii) restrict or object to the processing of their personal data; and (iii) obtain a copy of their personal data in a portable format. Additionally, under California Civil law, Californians are entitled to request information relating to whether a business has disclosed personal data to any third parties for the third parties' direct marketing purposes. If you need to reach us about a privacy or data protection matter, please contact us using the details below. These rights are not absolute and we reserve all of our rights available to us at law in this regard. Additionally, if we retain your personal data only in de-identified form, we will not attempt to re-identify your data in response to a request.

If you make a request related to personal data about you, we will need to verify your identity. To do so, we will request that you match specific pieces of information you have provided us previously, as well as, in some instances, provide a signed declaration under penalty of perjury that you are the individual whose personal information is the subject of the request. If it is necessary to collect additional information from you, we will use the information only for verification purposes and will delete it as soon as practicable after complying with the request. For requests related to particularly sensitive information, we may require additional proof of identification. If you make a request through an authorized agent, we will require written proof that the agent is authorized to act on your behalf. We will process your request within the time provided by applicable law.

We can be reached at [info@stoneridgeam.com](mailto:info@stoneridgeam.com) or call us at (212) 257-4775.

#### **IX. Changes to this Privacy Notice**

We may change or update portions of this Privacy Notice at any time without notice to you. Please check back from time to time so you are aware of any changes or updates to the Privacy Notice. The revision date appearing on the first page of this Privacy Notice underneath the title will identify the date of the last update or revision.

#### **X. Contacting Us**

If you have any questions or concerns about this Privacy Notice, please contact us:

by email at [info@stoneridgeam.com](mailto:info@stoneridgeam.com) or by phone at (212) 257-4775.