

# California Privacy Notice

Your privacy is important to us and maintaining your trust is our priority. Bristlecone Value Partners LLC, (“Bristlecone,” “we,” “our,” or “us”), respects your privacy and is committed to protecting it through our compliance with this California Privacy Notice. We believe you have the right to know what information we collect, how we use it and what security measures we have taken and will continue to take to protect your information.

This California Privacy Notice supplements the information contained in Bristlecone’s Privacy Policy Notice and applies solely to visitors, users, and others who reside in the State of California (“consumers” or “you”) and engage us for investment advisory services.

We adopt this notice to comply with the California Consumer Privacy Act of 2018 (“CCPA”) and any terms defined in the CCPA will have the same meaning when used in this notice. Capitalized terms used but not otherwise defined herein or in the CCPA shall have the meanings given to such terms in our Privacy Policy Notice.

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## I. Information We Collect

### A. Personal Information

Our Services collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device ("personal information"). In particular, Bristlecone's Services have collected the following categories of personal information from its consumers within the last twelve (12) months:

1. **Identifiers:** First name, maiden name, last name, physical address, email address, telephone number, username, Internet Protocol (IP) address, account name.
2. **Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)):** A name, address, telephone number, education, employment, employment history, and, if you are a client, your financial information (including a bank account number.) Some personal information included in this category may overlap with other categories.
3. **Protected classification characteristics under California or federal law:** Bristlecone does not request or require you to provide protected classification characteristics. However, please carefully consider the information contained within your new account application, investor profile and investment management agreement to ensure that you are not providing any protected classification characteristics that are not necessary for your engagement with us as your investment advisor.  
Protected classification characteristics include your age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, genetic information (including familial genetic information), and veteran or military status.  
Advisors may request a veteran or military status or marital status in accordance with applicable law, and you may choose whether to submit that information with your new account application.
4. **Commercial information:** Records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies, such as details about payments to and from you, and details regarding the services that you have engaged us to provide to you or which investments are included in your portfolio.
5. **Internet or other similar network activity:** Cookie data and other similar activity concerning an interaction with our Services.
6. **Geolocation data:** IP Address.
7. **Professional or employment-related information:** Job industry, employer information, years in industry or with current employer, job applications, and any information provided in a resume/CV or job seeker profile (including, but not limited to, executive summary, objective, current or prior work experience and education).

Bristlecone has not collected any of the following categories of personal information from consumers within the last twelve (12) months:

1. Biometric information (such as genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data)
2. Sensory data (such as audio, electronic, visual, thermal, olfactory, or similar information)
3. Non-public education information, per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)) (such as education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.

#### B. Non-Personal Information

Bristlecone uses de-identified and/or aggregated consumer information, which is not considered personal information. Deidentified or aggregated data may be derived from your personal information, but is not considered personal information under CCPA, since it does not directly or indirectly reveal your identity. For example, we may aggregate your Internet or other similar network activity to calculate the percentage of users accessing a specific website feature.

#### C. Sources of Personal Information

We obtain the categories of personal information listed above from the following categories of sources:

1. **Directly from you.** For example, when you fill in forms, create an account, submit your investor profile, or correspond with us by post, phone, e-mail or otherwise and when you use our Site.
2. **Indirectly from you.** For example, through automated technologies or your interactions with us, including from observing your actions when you use our Website.
3. **Third Parties.** We may receive personal information about you from various third parties such as other professionals including, but not limited to, other investment advisors, financial planners, custodians, broker-dealers, accountants, and attorneys.
4. **In our capacity as a service provider** (see Section 5. below).

## II. Use Of Personal Information

We describe in detail in our Privacy Policy Notice the context in which your personal information may be collected, along with how and why we use your personal information. Pursuant to the CCPA, we may use the personal information we collect for one or more of the following business or commercial purposes:

1. To fulfill or meet the reason for which the personal information is provided. For example, if you provide your personal information to create an account, we will use that information to create your account and provide investment advice.
2. To create, maintain, manage, customize, and/or secure your account with us.
3. To communicate with you about your account or our Services, and to manage our relationship with you.
4. To provide you with support and to respond to your inquiries, including investigating and address your concerns and monitor and improve our responses.
5. To send you communications such as articles, e-newsletters, information on client events, and our services.
6. To maintain certain of your information on a suppression list, if you've indicated to us that you don't want to be communicated in a particular way.
7. To enable our website to function properly (ensure proper display of content), create and remember your account login details, and for interface personalization, such as language, or any user-interface customization.
8. To provide, support, personalize, and develop our Services.
9. To process your requests, transactions, and payments, and prevent transactional fraud.
10. To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing or collections, or manage payment disputes or issues with the services.
11. To help maintain the safety, security, and integrity of our Services, databases and other technology assets, and business.
12. To detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, and prosecute those responsible for that activity.
13. For testing, research, analysis, and product development, including to collect statistics and develop and improve our website or Services.
14. For debugging to identify and repair errors that impair existing intended functionality of our website or Services.
15. To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
16. As described to you when collecting your personal information or as otherwise set forth in the CCPA.
17. In connection with or during negotiations of any proposed or actual financing, merger, purchase, sale, sale or transfer of some or all of our assets or stock, joint venture, or any other type of financing, acquisition or business combination of our company, or all or any portion of our assets, or transfer of all or a portion of our business to another company, including without limitation in the event of a divestiture, restructuring, reorganization, dissolution or other event, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which personal information held by Bristlecone is among the assets transferred.

Bristlecone will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

### III. Sharing Personal Information

#### A. Disclosures of Personal Information at Your Direction

We disclose your personal information when you intentionally interact with third parties and when you direct us or intentionally use Bristlecone to share your personal information in connection with the services that we provide to you. For example, as an investor, you may seek the services of third parties with whom we have an existing relationship, or you may have participated in an event hosted by us and a third party. In these circumstances, we may share your personal information with the third party and/or their agents or representatives.

Separate from the CCPA, California's Shine the Light law gives California residents the right to ask companies what personal information they share with third parties for those third parties' direct marketing purposes. We do not disclose your personal information to third parties for the purpose of directly marketing their goods or services to you unless you request such disclosure.

#### B. Disclosures of Personal Information for a Business Purpose

We describe in our Privacy Policy Notice the context in which your personal information may be disclosed to or shared with a third party. Pursuant to the CCPA, Bristlecone has disclosed the following categories of personal information for a business purpose in the preceding twelve (12) months:

1. **Category A:** Identifiers – Name, address, social security number, birthdate
2. **Category B:** California Customer Records personal information categories
3. **Category C:** Protected classification characteristics under California or federal law
4. **Category D:** Commercial information
5. **Category G:** Professional or employment-related information

We may disclose your personal information for a business purpose to the categories of third parties identified in our Privacy Policy Notice, depending on how you use or interact with our website or Services. This may include disclosure of personal information to the following:

1. Service providers that we use to support our business, provide services to us, and/or help provide our services to you.
2. Professionals such as lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance, financial planning or consulting, auditing, and accounting services to us so we can provide additional products and services to you to meet your financial needs
3. Taxing authorities, such as the Internal Revenue Service and other authorities acting as processors who require reporting of processing activities in certain circumstances.
4. Fraud prevention and identity verification services where we believe that disclosure is necessary or appropriate to protect the rights, property, or safety of Bristlecone, our clients, or others. This includes exchanging information with third parties for the purposes of fraud detection and prevention and risk reduction.

5. Law enforcement agencies, courts, supervisory authorities, regulatory bodies and certain other third parties, to the extent that we are permitted or required to do so by law, or in order to comply with our legal and regulatory obligations, or in the interests of national security, or to respond to verified requests relating to a criminal investigation or alleged or suspected illegal activity.

6. To enforce agreements with you, to respond to, and defend ourselves against, claims asserted against us, to protect the rights, property, or safety of Bristlecone, our services, clients or others, or to investigate, prevent, or take action regarding suspected or actual illegal activities or for debt collection.

7. In connection with or during negotiations of any proposed or actual financing, merger, purchase, sale, sale or transfer of some or all of our assets or stock, joint venture, or any other type of financing, acquisition or business combination of our company, or all or any portion of our assets, or transfer of all or a portion of our business to another company.

#### C. Sale of Personal Information

Your privacy is our priority, and we do not monetize your personal information by selling it to third parties.

### IV. Your Rights and Choices

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how you can exercise them.

#### A. Access to Specific Information and Data Portability Requests

You may request that Bristlecone disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request (see Exercising Access, Data Portability, and Deletion Requests below), we will disclose to you:

1. The categories of personal information we collected about you.
2. The categories of sources for the personal information we collected about you.
3. Our business or commercial purpose for collecting or selling that personal information.
4. The categories of third parties with whom we share that personal information.
5. The specific pieces of personal information we collected about you (also called a data portability request).
6. If we disclosed your personal information for a business purpose, two separate lists disclosing: (i) sales, identifying the personal information categories that each category of recipient purchased; and (ii) disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

#### B. Deletion Requests

You may request that Bristlecone delete any of your personal information we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request (see Exercising Access, Data Portability, and Deletion Requests), we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request, in whole or in part in accordance with any purpose that is permitted by the CCPA. For example, we may deny your deletion request if retaining the information (or a portion thereof) is necessary for us or our service provider(s) to:

1. Complete the transaction for which we collected the personal information, provide a product or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you;
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities;
3. Debug products to identify and repair errors that impair existing intended functionality;
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law;
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.);
6. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us;
7. Comply with a legal obligation; and/or
8. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

#### C. Exercising Access, Data Portability, and Deletion Requests

To exercise an access, data portability, or deletion request as described above, please submit a verifiable consumer request to us in one of the following ways:

1. Send an email to [info@bristlecone-vp.com](mailto:info@bristlecone-vp.com) to inquire as to which elements of your information it's possible for us to delete.
2. If you would like to close your account, please contact your Portfolio Manager.

Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

1. Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative; and
2. Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. Making a verifiable consumer request does not require you to create an account with us. However, we do consider requests made through your password protected account sufficiently verified when the request relates to personal information associated with that specific account.

We will only use personal information provided in a verifiable consumer request to confirm the requestor's identity or authority to make the request.

#### D. Response Timing and Format

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time, we will inform you of the reason and extension period in writing. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance, e.g., through an Excel or JSON file format.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

#### E. Opting Out from the Sale of Personal Information

We do not sell your personal information. We will only use and share your personal information according to this Privacy Policy and as outlined in our Investment Advisor Agreement with you. If we later decide to sell our clients' personal information, you will be notified immediately and you will be provided with the proper disclosures and the opportunity to exercise your right to "opt-out".

#### F. Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

1. Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties other than for reasons described in our Form ADV Part 2A or Investment Advisory Agreement.
2. Provide you a different level or quality of products or services except as otherwise described in our Form ADV Part 2A or Investment Advisory Agreement.
3. Suggest that you may receive a different price or rate for products or services or a different level or quality of products or services except as otherwise described in our Form ADV Part 2A or Investment Advisory Agreement.

### V. Security

Bristlecone will make every effort to protect the privacy and security of your personal information. We are committed to keeping personal information secure and have implemented the appropriate information security practices, policies, rules and technical measures to protect the personal information under our control from unauthorized access, improper use or disclosure, unauthorized modification and unlawful destruction or accidental loss.

Our employees, consultants, temporary workers and data processors (i.e., those who process your personal information on our behalf and for the purposes listed above) who have access to, and are associated with, processing your personal information are obligated to respect the confidentiality of your personal information and must comply with Bristlecone's privacy policies.



## VI. Changes to This California Privacy Notice

We reserve the right to change this California Privacy Notice at any time. If we propose to make any material changes, we will notify you by posting a notice on our website or by issuing an email to the email address listed by account holder(s) prior to the changes becoming effective and update the notice's effective date. You acknowledge that it is your responsibility to maintain a valid email address as an account holder, and to review our website, Privacy Policy, and this California Privacy Notice periodically in order to be aware of any modifications. If you object to any changes to the revised Privacy Policy or this California Privacy Notice, you can stop using our Services and close your account with us. However, if you continue to use our Services (including the Website) after we publish a new or updated California Privacy Notice, you acknowledge that such continued use means that the treatment of your personal information will be subject to the new or updated California Privacy Notice.

## VII. Contact Information

If you have any questions or comments about this notice, the ways in which Bristlecone collects and uses your information described herein, your choices and rights regarding such use, or wish to exercise your rights under California law, please contact us by phone, postal mail, or email:

**Bristlecone Value Partners, LLC**  
**12301 Wilshire Blvd., #320, Los Angeles, CA 90025**  
**(310) 806-4141**  
**[info@bristlecone-vp.com](mailto:info@bristlecone-vp.com)**