



INVESTMENTS
MEMBER FINRA, SIPC

PRIVACY NOTICE AND POLICY



CWS Capital Partners (“CWS”, “we”, and “us”) has created this Privacy Notice and Policy (“**Privacy Policy**”) in order to demonstrate our commitment to protecting the personal information of (a) users of the CWS website (“**Site**”) or the online services, systems or applications of CWS (collectively, “**Services**”); (b) our existing and prospective clients, and their personnel, users and representatives; and (c) any other individuals from whom we collect personal data during the course of our business activities. Such persons can include investors with whom we are currently doing business, third parties with whom our investors have a relationship, or visitors to our Site seeking information about our company or who are interested in investing with us.

This Privacy Policy describes the personal data CWS collects, how we use your personal data, with whom we may share such data, and how you can contact us, access your personal data and exercise your rights regarding our use of your personal data. As used in this Privacy Policy, “**personal data**” means data that identifies, relates to, describes, or that could be linked to a particular identified or identifiable natural person. ***By using or accessing the CWS Website, using CWS Services, or otherwise providing personal data to CWS, you signify your acknowledgment and assent to this Privacy Policy.***

Changes to Privacy Policy

This Privacy Policy may be updated from time to time to reflect changes to our information practices. If we make any material changes we will notify you using contact information you have provided to us, via your account or the Services, or by means of posting an updated version of this Privacy Policy on the Site. We encourage you to periodically review our posted Privacy Policy for the latest information on our privacy practices. Any modifications to this Privacy Policy will be effective upon our posting or notification of the new terms, and your continued use of the Site, Services or our other products and services thereafter indicates acceptance of the modified Privacy Policy. If you do not agree to any part of a modified Privacy Policy, then you must terminate your account and stop accessing the Site and Services.

Data Collection

We may collect personal data from you directly such as from contracts, service applications, subscription agreements, investor questionnaires, or other forms, from forms on the Site or Services; from surveys; in connection with an audit; when you submit a query to us; or from other communications with us. We may also collect information about you from individuals and/or entities whom you have authorized to act on your behalf and/or to provide information about you, and in connection with your transactions with us, any of our affiliates or others. Where permissible by applicable law, we may also collect personal information from publicly available sources. Such personal data may include, among other things:

- Identification data (e.g., name, date of birth, Social Security Number, Tax Identification Number, driver’s license number)
- Contact data (e.g., legal address, mailing address, country, email address, phone number, title, email address)

- Financial data (e.g., income, net worth, bank account information, investment goals, investment experience, beneficiaries)
- Education and employment data (e.g., education level, occupation, employer name and address)

Use and Processing of Personal Data

We use and process your personal data for reasonable and legitimate business purposes, to perform and fulfill our contractual obligations to you, and to comply with legal obligations, including for the following purposes:

- Contacting you regarding business transactions and information related to your investments and to comply with regulatory requirements.
- Contacting you regarding future investment opportunities, trends in investing, and changes in our activities, products and services, as permitted by applicable law.
- Performing business and administrative processes related to your investment(s) and account.
- Developing, enhancing, and improving our products and services.
- Monitoring our processes for compliance with regulatory requirements.
- Administering and managing our relationship with you.
- Evaluating, reviewing, approving, or entering into potential contractual arrangements.
- Enhancing the security of our network and information systems.
- Understanding and monitoring how people interact with our Site and Services.
- Complying with our obligations under applicable law, industry guidelines and internal policies.

We do not use your personal data without a lawful basis, or for purposes contrary to this Privacy Policy, without your consent.

Sharing of Personal Data

In connection with the purposes above, we may share your personal data with third parties in the following circumstances:

- We may share your personal data with third party companies that perform services on our behalf, help us service your accounts, facilitate formation of electronic contracts, or assist us in reaching out to investors for activities such as annual meetings, special votes, or new offerings (collectively, “**Service Providers**”), including the third party operator of the Site (currently AmericanEagle.com) (the “**Site Operator**”). We have contracts with Service Providers that prohibit them from using your personal data for their own purposes.
- We may disclose your account and transaction data to other financial institutions, auditors, attorneys, or regulators to facilitate your investment.
- We may disclose your personal data as required (or requested by law enforcement) and permitted by law or regulation, including in response to a subpoena or to respond to an emergency situation.
- We may disclose your personal data in limited circumstances to perform background checks as required by law,
- We reserve the right to disclose personal data in special cases when we have reason to believe that disclosing this information is necessary to identify, contact, or bring legal action against someone who may be causing injury or interference with (either intentionally or unintentionally) our rights or property or anyone else that could be harmed by such activities.
- In the event CWS or its affiliates or their assets are sold, merged or otherwise involved in a corporate transaction, your personal data will likely be transferred as part of that transaction – we reserve the right

to transfer your personal data without your consent in such a situation; provided that we will make reasonable efforts to see that your privacy preferences are honored by the transferee.

Outside of the limited exceptions above, CWS will not share your personal information with third parties unless you have specifically requested that information be released to them or have otherwise consented to such sharing.

Usage Information

Our systems and servers may collect general data pertaining to your use of the Site and Services, including info about the mobile devices and programs which you use to access such offerings (“**Usage Information**”). Usage Information can include: the name of the domain and host from which you access the Internet; the Internet Protocol (IP) address of the device you are using; the browser software and operating system you are using; mobile device type, device operating system, device settings, the date and time of access (including the length of time spent, the pages accessed while visiting, links clicked, and number of visits, and country of origin); and the address of the Internet site from which you have arrived at our Site or Services. This Usage Information is collected to help us manage and administer our Site, Services and systems, improve the content of our products and services, and customize and improve user experience. Usage Information is gathered using the following methods: (1) cookies, (2) tags/beacons, (3) third-party website analytics tools (Google® Analytics, Google Tag Manager, and Incapsula), and (4) general detection and use of your internet protocol (IP) address or domain name.

Cookies. We may collect Usage Information through the use of “cookies,” which are small text files that are saved by your browser or device that serve a number of purposes, such as remembering your preferences (e.g., language) and generally improving your user experience. We (and our third-party analytics providers, such as Google® Analytics) may use both session cookies and persistent cookies to gather analytics about our Site and Services, including Usage Information and demographic information in a non-identifiable form, in order to monitor usage and traffic, improve performance and customize users’ experience. Although most browsers automatically accept cookies, you can change your browser options to stop automatically accepting cookies or to prompt you before accepting cookies. Please note, however, that if you don’t accept cookies, you may not be able to access all portions or features of our Site or Services. This Privacy Policy covers the use of cookies by our Site and Services but does not cover the use of cookies by any Service Providers for the Site (including Google Analytics and the Site Operator). Such Service Providers may employ cookies, device identifiers, or similar technologies to collect their own Usage Information which will be governed by the applicable third party’s privacy policy. Please review "How Google uses data when you use our partners' sites or apps" for information about how Google uses information collected through Google Analytics and how you may refuse the use of cookies. You can find information about the Site Operator’s privacy policy at <https://www.americaneagle.com/legal/privacy>.

Beacons. We may also employ, and/or our Service Providers may employ, software technology called tags or web beacons (a.k.a. pixel tags or clear gifs), that help us better manage Site and Services content and communications by informing us what content is effective and how it is used. These beacons (or other tracking technology) may also be included in or associated with e-mails or other communications that you receive from us (or our partners) in order to help us track your response and interests and to deliver you relevant content and services. For account holders we may link information gathered by web beacons or other tracking technology to personal data.

Use of Aggregate and Non-Personally Identifying Information

We may anonymize, pseudonymize, aggregate or de-personalize personal data and/or Usage Information to create non-personally identifiable information (“**Anonymized Data**”). We may freely disclose and use Anonymized Data and other non-personally-identifying information for industry analysis, statistical purposes,

demographic profiling, marketing and advertising, and other business purposes (which may include reporting on trends in the usage of Sites or Services).

Transfer of Personal Data

All personal data that you provide to us in connection the Sites and Services will be processed and maintained by us on servers in the United States, and it may also be transferred by us to Service Providers within the United States or elsewhere (which may include countries outside of the European Economic Area), including to the **Site Operator**. By agreeing to this Privacy Policy, you consent to such transfer of your personal data.

Retention of Personal Data

CWS will retain your personal data for as long as your relationship is active and as reasonably needed to maintain business records for audit purposes, meet regulatory requirements, defend or bring potential legal claims, and respond to post-termination inquiries. In addition, personal data may be retained for such additional time as may be required under applicable law, including record retention requirements. If you wish to request that we no longer use your personal data to provide you with products or services, contact us using the contact information provided below.

Security

CWS maintains appropriate physical, electronic and procedural safeguards and controls to help to protect against the loss, misuse, alteration and unauthorized disclosure of personal data in our possession or under our control. We periodically test the security protections of our information systems and monitor the effectiveness of our information security controls, systems and procedures. Although we take appropriate measures to safeguard against unauthorized disclosure of person data, no assurances can be provided that personal data that we process will never be disclosed in a manner that is inconsistent with this Privacy Policy.

Links to Third-Party Offerings and Social Media Functionality

Our Site and Services may provide links to other external websites or services, including to CWS affiliates (for example, to CWS Apartment Homes which has a separate privacy policy available [here](#)), and may also include social media features such as the Facebook “like” button, widgets such as the “share this” button, and other social media functionality, such as that provided by Add This. These third party sites and features may collect your personal data and track your use of our Site or Services. We are not responsible for the data collection or privacy practices of those third party offerings and social media features, and this Privacy Policy does not cover any such collection activities. We do not control the use of cookies (or the resulting information) collected by such third parties. Users are advised to review the privacy policies of those websites and features for information before use.

Policies for Children

CWS does not intentionally collect or use any personal data from users under 18 years of age. No data should be submitted to the CWS Site or Services by users under 18 years of age.

California Privacy Rights

CWS does not provide personal data to any third party for such third party's direct marketing purposes. CWS does not collect personally identifiable information about an individual user's online activities over time across third party web sites (and thus does not monitor your browser's Do Not Track indicator).

Access to Personal Data

You may review, update, correct or delete certain personal data associated with your account by logging into your account. If you wish to update or delete other personal data, you can contact us using the contact points specified below. To the extent authorized by law, we will take steps to modify or delete your personal data as soon as is practical, but some information may remain in archived/backup copies for our records or as otherwise required by law.

CWS Communications

If you wish to request that CWS no longer use your personal data to provide you with communications, you may use the opt-out method contained in any message you receive or you can contact CWS at the contact points specified below. You may not opt-out of receiving essential updates regarding your relationship or transactions with CWS.

GDPR Notice

CWS is a U.S. company. We are not registered or licensed to offer securities or investment advice within any foreign jurisdiction and therefore do not conduct business in the European Union or seek to collect personal data from residents of the EU. To the extent we collect information or interact with residents of the EU in a manner governed by the General Data Protection Regulation (EU) 2016/679 of the European Parliament and of the Council of 27th April 2016 (the "GDPR") we will comply with the GDPR and its national implementations. For covered data transfers outside the EEA to third parties, we will rely on appropriate safeguards, as defined in GDPR and as approved by applicable governmental authorities, to provide an adequate level of protection. To the extent provided for under GDPR, a data subject in the EU will be entitled to exercise the following applicable data subject rights: access your personal data; obtain information on the processing of your personal data; have your personal data rectified or erased or its processing restricted; exercise your right to data portability; or withdraw any consent that you might have given to the processing of your personal data, including any consent for any direct marketing purposes with future effect.

If you would like to exercise your data subjects rights or learn more about the details of the processing of your personal data under GDPR, please contact us using the information provided below. We will respond to your request(s) as soon as reasonably practicable within the legally required period of time. To help protect your privacy, we take reasonable steps to verify your identity before granting access to your personal data or responding to your requests.

If you are not satisfied with our response or believe that we are not processing your personal data in accordance with applicable law please contact us using the contact information provided below. You also may contact or register a complaint with the competent supervisory authority or seek other remedies under applicable law.

CONTACT INFORMATION:

If you have any questions regarding this Privacy Policy please contact us using the contact information provided below:

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