

## Privacy Policy – Effective May 2022

Moor Funds LLC  
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Dallas, Texas 75226

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Email: [invest@moorfunds.com](mailto:invest@moorfunds.com)  
[www.moorfunds.com](http://www.moorfunds.com)

This Privacy Policy sets forth the privacy practices of Moor Funds LLC (“Moor Funds,” “we,” “our,” or “us”) concerning our collection, use, sharing, and disclosure of Personal Information, including, but not limited to, Personal Information collected through this website (the “Site”), how it is used, and the circumstances under which it may be shared and disclosed. This Privacy Policy constitutes a legally binding agreement between you and Moor Funds that conditions your use of the Site, where and as permitted by applicable law.

### 1. Personal Information We Collect

When you visit the Site and during our ordinary business activities, Moor Funds may collect or ask you to provide certain nonpublic personal information (“Personal Information”) to help us manage our relationship with you and serve your investment needs. The Personal Information we may collect from you may include personally identifiable information including names, residential or business addresses, or other contact details, signature, nationality, tax identification or passport number, date of birth, place of birth, photographs, copies of identification documents, bank account details, information about assets or net worth, credit history, information on investment activities, or other personal information, such as certain special categories of personal data (including, where relevant, information on political affiliations, ethnic origin, or criminal convictions), as specified under applicable law, that may be contained in the relevant materials, documents, or obtained through background searches. For further information on how your investment information is managed by us, you may request a copy of our ‘Regulation S-P’ policies by emailing [invest@moorfunds.com](mailto:invest@moorfunds.com).

### 2. Sources of Personal Information

We may collect Personal Information from:

- Your communications with us;
- Your transactions with us;
- Services providers and Affiliates.

### 3. How we Use Personal Information

We use Personal Information for the following business purposes:

- provide our products and services and serve your investment needs;
- offer new products and services;
- open an advisory account or securities brokerage account;
- process transactions for your accounts;
- confirm your identity or communicate with you;
- protect the security and integrity of the Site;
- prevent or investigate fraud or other unlawful activity, and detect security incidents;
- comply with and enforce applicable legal requirements;

### 4. How we Share Personal Information

Your privacy is important to us. Moor Funds does not disclose any Personal Information to non-affiliated third parties, except to service or manage a client's account or as permitted by law. We do not sell any Personal Information.

Every client has the right to direct Moor Funds not to disclose the Personal Information about that client to a nonaffiliated third party. If a client would like to exercise their right to opt-out of this Privacy Policy, each client must provide a written statement exercising that right. This right to opt-out may be exercised at any time and will remain in effect until written notice revoking said right is received by Moor Funds from the client. However, in the event Moor Funds encounters circumstances where it is compelled by law to disclose a client's Personal Information, Moor Funds must provide, to non-affiliated third parties, a client's Personal Information even if the client has exercised its right to opt-out.

### 5. How we Protect Personal Information

Moor Funds seeks to carefully safeguard Personal Information. We will use commercially reasonable efforts to ensure that Personal Information is kept secure and safe from any loss or unauthorized disclosure or use. We restrict access to our client's Personal Information to employees requiring that Personal Information to provide our products or services.

### 6. Notice for Residents of the European Economic Area and the United Kingdom

Moor Funds does not currently offer its products or services to natural persons resident in the European Union or the United Kingdom ("EEA/UK") and, accordingly, is not required to comply with the EU General Data Protection Regulation ("GDPR"). Any personal data provided to us by you will be processed in the United States or other jurisdictions outside the EEA/UK which may not afford the same protections of personal data as under the GDPR.

## 7. Contact Us

If you have any questions or comments about this Privacy Policy, please feel free to contact Moor Funds at [invest@moorfunds.com](mailto:invest@moorfunds.com).

## 8. Privacy Notice for California Consumers

Effective May 4<sup>th</sup>, 2022

This notice contains disclosures required by the California Consumer Privacy Act (“CCPA”), is only relevant to residents of California, and applies only to the collection or other use of “personal information” that is subject to the CCPA. Consumers with disabilities may access this notice by emailing [invest@moorfunds.com](mailto:invest@moorfunds.com).

### Information We Collect.

In any given 12-month period we may collect the following categories of personal information about California consumers:

#### A. Identifiers

- A real name, alias, email address, Internet Protocol (IP) address, account name, or other similar personal identifiers.

#### B. Other personal information categories, as listed in the California Customer Records statute

- A signature, telephone number.

#### C. Internet or other similar network activity

- Browsing history, search history, information on a consumer’s interaction with a website, application, or advertisement.

We do not knowingly collect, solicit or sell personal information from anyone under the age of 16 under any circumstance.

We collect personal information from the following categories of sources:

- Your communications with us;
- Service providers, including, but not limited to: administrators, lenders, banks, brokers, auditors, law firms, consultants, employment agencies, credit bureaus;

### Use of Personal Information.

We may use the personal information we collect for one or more of the following purposes:

- Providing you with information about our products and services;
- Providing performance and other updates;

One or more of the following business purposes:

- Performing services (for us or our service provider) such as account servicing, processing orders and payments, and analytics;
- Auditing related to our interactions with you (e.g., counting ad impressions to unique visitors, verifying positioning/quality of ad impressions, auditing compliance, etc.);
- Legal compliance;
- Detecting and protecting against security incidents, fraud, and illegal activity;
- Internal research for technological improvement;
- Internal operations;
- Activities to maintain and improve our services;

### Sharing Personal Information.

We may disclose personal information in one or more of the categories identified above to:

- Service providers, including but not limited to: administrators, lenders, banks, brokers, auditors, law firms, consultants, employment agencies, credit bureaus;
- Business partners;
- Legal or government regulatory authorities as required by applicable law;
- In connection with a potential business transfer;

In the past 12 months, we have not sold any personal information we collect to third parties and will continue NOT to sell personal data.

### Rights of California Consumers.

The CCPA provides a California consumer the following rights, subject to certain exceptions and limitations:

- The right to request (a) the categories and specific pieces of personal information we collect, use, disclose, and sell about you, (b) the categories of sources from which we collected your personal information, (c) our purposes for collecting or selling your

personal information, (d) the categories of your personal information (if any) that we have either sold or disclosed for a business purpose, and (e) the categories of third parties with which we have shared personal information;

- For certain categories of personal information, the right to request a list of what personal information (if any) we disclosed to third parties for their direct marketing purposes in the past 12 months and the names and addresses of those third parties;
- The right to request that we delete the personal information we have collected from you or maintain about you;
- The right to opt-out of our sale(s) (if any) of your personal information;
- The right not to receive discriminatory treatment for the exercise of the privacy rights conferred by the CCPA;

You may submit requests relating to your exercise of rights under the CCPA to Moor Funds:

Moor Funds LLC  
2550 Pacific Avenue, Suite 700  
Dallas, Texas 75226

Tel: +1 (800) 542-5185  
Email: [invest@moorfunds.com](mailto:invest@moorfunds.com)

We may need to request additional information from you to verify your identity or understand the scope of your request. In verifying requests, we will require you to provide, at a minimum, a phone number or mailing address. If we are unable to verify your identity, we will need to deny your request.

You may designate an authorized agent to make a CCPA request on your behalf. In such cases, we will ask the agent to provide proof that you have given the agent signed permission to act on your behalf. In addition, we will ask you to either (1) verify your identity directly with us in the manner described above or (2) directly confirm with us that you have provided the agent permission to request on your behalf.