

# EU General Data Protection Regulation Addendum

The following addendum is in accordance with the EU General Data Protection Regulation (referred to as GDPR) effective May 25, 2018.

## Information Collected

A client (a) is the sole controller of Client Personal Data or (b) has been instructed by and obtained the authorization of the relevant controller(s) to agree to the processing of Client Personal Data by Callan Capital as set out in this Privacy Policy and our Investment Management and/or financial planning agreements. Callan Capital collects only necessary information directly from its clients and their trusted advisors to perform requested and contractually agreed upon investment management and financial planning services. In accordance with Callan Capital's fiduciary duty to its clients, Callan Capital affirms that all client information that is collected and stored is obtained in the best interest of the client and Callan Capital's provided services.

## Access and disposal of Client Personal Data

Client Personal data is only provided to employees and client authorized third-party individuals who require access to the data to perform contractually obligated services. Client Personal data is disposed of securely following the duration of service or once retention is no longer required by law, whichever is longer.

## Security of Client Personal Data

Callan Capital will implement and maintain technical and organizational measures (TOMs) to ensure a level of security appropriate to the risk for Callan Capital's scope of responsibility. TOMs are subject to technical progress and further development. Accordingly, Callan Capital reserves the right to modify TOMs provided that the functionality and security of the services are not degraded.

## Personal Data Breach

Callan Capital will notify client without undue delay after becoming aware of a personal data breach with respect to the services. Callan Capital and its IT provider will promptly investigate the personal data breach if it occurred on Callan Capital infrastructure or in another area Callan Capital is responsible for.

## Client GDPR Rights

These rights can be exercised or addressed (subject to retention and other requirements under applicable law) by contacting Callan Capital's Data Protection Officer.

- **Access.** A client has the right to obtain access to their personal data
- **Rectification.** A client has the right to ask for incorrect, inaccurate, or incomplete personal data to be corrected
- **Erasure.** A client has the right to request that personal data be erased
- **Restriction of Processing.** A client has the right to request the restriction of processing of their personal data in specific cases

- **Objection to Processing.** A client has the right to object to the processing of their personal data from marketing purposes or on grounds relating to their particular situation.
- **Portability.** A client has the right to receive their personal data in a machine-readable format and send it to another controller
- **Withdrawal of Consent.** A client has the right to withdraw consent from Callan Capital's direct marketing.
- **Lodging a compliance with a Supervisory Authority.** A client has the right to lodge a complaint with a Supervisory Authority within their Member State.

#### **Data Protection Officer**

Callan Capital has designated Ryan Callan, Chief Compliance Officer as its Data Protection Officer. If you have any questions regarding the data collected, stored and used by Callan Capital, please contact us at 858-551-3800.