

# PRIVACY POLICY

**Effective Date:** March 9, 2026

Chelsea Street Advisors is committed to protecting the privacy and security of information we collect about you. This Privacy Policy (this “Policy”) describes the types of information we may collect from or about you and explains how we collect, use, maintain, protect, and disclose that information.

In this Policy, references to “we” or “us” are references to Chelsea Street Advisors, LLC. References to our “Website” include our website(s) and any mobile application(s) and social media sites we control.

Because our services are designed to be used by commercial entities, the information we collect relates almost entirely to those organizations and their employees and representatives. We do not purposely collect any information about consumers. This Policy is not to be interpreted to apply privacy law rights to information that does not qualify as “personal information” under applicable law.

Please read this Policy carefully to understand our policies and practices regarding your information and how we will treat it. By accessing or using our Website or by otherwise providing information to us, you agree to this Policy. If you do not agree to this Policy, you should not use our Website or provide personal information to us in any other way.

A printable copy of this Policy is available [here](#).

## Information We Collect

We may collect the following categories of information from and about users of our Website, including:

- Information that identifies, relates to, describes, or is capable of being associated with a particular individual, such as name, address, email address, telephone number, and demographic information.
- Job applicant data, including work history, educational background, and other professional or employment-related information.
- Information about your internet connection, the equipment you use to access our Website, and usage details, such as IP address, mobile device and online identifiers, operating system, Mac address, cookie IDs, browser activity, search history, access times, social media information, and information regarding your interaction with our Website.

We collect this information:

- Directly from you when you provide it to us.

- Automatically as you navigate through our Website. Information collected automatically may include usage details, IP addresses, and information collected through cookies, web beacons, and other tracking technologies.

## **How We Use Your Information**

We use the information we collect about you or that you provide to us:

- To provide you with a smooth, efficient, and customized Website experience.
- To monitor and analyze usage and trends and improve the performance, functionality, and usability of our Website.
- To provide customer service, deliver services, and communicate with you about our services.
- To respond to your requests, inquiries, feedback, or form submissions.
- To promote our services and develop marketing programs.
- To carry out our obligations and enforce our rights arising from contracts.
- For recruiting purposes, and to screen, identify, and evaluate candidates for positions.
- To respond to any legal process or to any court order, subpoena, or a law enforcement agency as required by law.
- To fulfill any other purpose for which you provide the information.
- For any other purpose permitted under applicable law.

## **Disclosure of Your Information**

We may share information that we collect in certain situations. Your information may be disclosed:

- To our affiliates.
- To contractors, service providers, and other third parties we use to support our business.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets (including in bankruptcy), or for pre-transaction review in relation to these transactions.
- To respond to any court order, law, or legal process; to investigate or remedy potential violations of our policies; to protect the rights, property, and safety of others; or to comply with any applicable law, rule, or regulation.
- For any other purpose disclosed by us when you provide the information.
- To fulfill the purpose for which you provide it.
- With your consent to do so.

## **Your Rights and How to Exercise Them**

If the information we collect or maintain about you qualifies as “personal information” under applicable privacy and data protection laws, you may have certain rights regarding that information. This section of the Policy applies only if and to the extent the information we collect about you is covered by an applicable privacy or data protection law.

Depending on where you live, you may have various rights with respect to our use, processing and sharing of your personal information. Please note that there are exceptions to some of these rights.

When privacy and data protection laws apply, you may have the right to:

- Confirm whether we are processing your personal information and access the information.
- Correct inaccuracies in your personal information.
- Delete personal information provided by or obtained about you.
- Obtain a copy of your personal information in a portable format.
- Opt-out of: (i) the processing of your personal information for targeted advertising; (ii) the sale of your personal information; and (iii) profiling performed in furtherance of automated decisions that produce legal or similarly significant effects.
- Non-discrimination for exercising any of these rights.
- Designate an agent to exercise your rights on your behalf.

You can exercise rights described in this Policy by emailing us at [info@chelseastreet.com](mailto:info@chelseastreet.com). Your request should include information that allows us to verify your identity (such as your name, address, and email address), a description of the right you want to exercise, and the information to which your request relates. We may ask for additional information to verify your identity before carrying out a request. You may also be permitted to authorize a third party to submit a request on your behalf; however, we may ask for confirmation of your authorization. We are not obligated to comply with a request if we cannot verify that the person making the request is the person about whom we collected information or is someone authorized to act on that person's behalf.

When we receive a request to exercise one of your rights, we will respond promptly and within the time required by applicable law. Depending on factors like the type and complexity of the request, this time may be extended in certain circumstances. We will not discriminate against you in any way for submitting a request or exercising any of your other rights.

Privacy and data protection laws generally require businesses to provide the information free of charge, once per year, except where requests are manifestly unfounded, excessive, or repetitive. In those circumstances, businesses may charge a reasonable fee to cover the administrative costs of complying with a request or decline to comply with the request. If applicable, we will advise you of any fees prior to proceeding with a request.

If a business declines to take action regarding a consumer's request, the business must notify the consumer without undue delay and within the time required by applicable law. Businesses are required to provide justification for declining and to provide information on the appeal process within a reasonable time after the communication of the decision to decline.

## **Data Retention**

We will retain your information for as long as we need it for the purposes described in this Policy, unless a longer retention period is required by law, to resolve disputes, or to enforce applicable agreements. Your information may persist in copies made for backup and business continuity purposes for additional time. Nothing in this Policy requires us to keep your information for any minimum period of time.

## **Cookies and Similar Technologies**

A cookie is a small text file that includes a unique identifier that is sent by a web server to the browser on your computer, mobile phone, or any other internet-enabled device when you visit an online site. Cookies and similar technologies are widely used to make websites work efficiently and to collect information about your online preferences.

You may refuse to accept or disable cookies by activating the appropriate setting on your browser or device. Please note that certain features or functionality of our Website may become unavailable if you set your preferences to block all cookies. Flash cookies operate differently than browser cookies, and cookie management tools available in a web browser will not remove flash cookies. To learn more about how to manage flash cookies, you can visit the Adobe website and make changes at the Global Privacy Settings Panel.

Some of our Website pages may contain electronic images known as web beacons (also known as clear gifs, tags, or pixels) that allow us to count users who have visited our pages and collect other website statistics. Web beacons collect only limited information (such as a cookie number, time and date of a page view, and a description of the page on which the web beacon resides). We may also carry web beacons placed by third party advertisers. These beacons do not carry any information that could directly identify you. We may also include web beacons in e-mail messages to track whether you open the messages. We use this information to customize our services and measure the overall effectiveness of our online content, marketing efforts, and the services we offer.

We work with a third-party website hosting company and Google Analytics, and may in the future also work with other third-party service providers, to help us track and analyze visitor activity on our Website, measure the effectiveness of our marketing efforts, and optimize the overall visitor experience. When you access our Website, your web browser automatically sends certain information regarding you and your use of our Website to these service providers. We do not provide these service providers with any information that identifies you personally. By accessing our Website, you consent to the collection and use of your information by these service providers. You can learn how Google uses the information from your web browser [here](#). You are encouraged to review Google's Privacy Policy ([here](#)) and contact Google directly if you have questions. If you do not want any information to be collected and used as described in this paragraph, you can download and install the Google Analytics Opt-out Browser Add-on ([here](#)) or use the Network Advertising Initiative Opt-Out Tool ([here](#)) or Digital Advertising Alliance Opt-Out Tool ([here](#)).

Some browsers and browser extensions support the Global Privacy Control (GPC) and other universal opt-out mechanisms that signal your request to opt out of certain types of data processing. When we detect such a signal, we will respect your choices to the extent required by applicable law.

## **Security**

We have implemented administrative, technical, and physical security measures to help protect the security of your information. While we take reasonable steps to secure the information you provide

to us, please be aware that despite our efforts, no security measures are perfect or impenetrable, and no method of data transmission can be guaranteed against any interception or other type of misuse. Transmission of information to and from our Website is at your own risk.

## **Emails and SMS Text Messaging**

We may send you communications by e-mail, text, phone, or mail. By providing your telephone number to us, you are consenting to be contacted by SMS text message. Message and data rates may apply.

You may opt out of our mailing list at any time by contacting us at [info@chelseastreet.com](mailto:info@chelseastreet.com). You may also click the “unsubscribe” link in emails to opt-out of further emails and reply “STOP” to opt-out of further text messaging.

## **External Links**

We may provide links to other websites that are not part of the services provided by us, but we are not responsible for the content, policies, materials, and practices of those websites. We do not control those websites or their privacy practices, and any information you provide to those websites is subject to the privacy policies of those websites and not this Policy. In addition, we are not responsible for the content, policies, materials, and practices contained at any websites that link to our Website.

## **Minors**

Our Website and services deliver business-related content and are not directed to persons under the age of 18. We do not knowingly collect personal information from anyone under the age of 18. If we learn we have collected or received personal information from a person under the age of 18 without verification of parental consent, we will delete that information.

## **Visitors From Outside the United States**

If you are located outside the United States, please be aware that you are sending information to the United States or another jurisdiction where the privacy laws may not be as protective as those in your jurisdiction. By using our Website or providing us with information in any other way, you consent to our collection, use, and disclosure of your information as described in this Policy.

## **Information About Other People**

If you provide information to us about another individual, such as your employee, supplier, stockholder, or director, you must ensure that (i) they understand how their information will be used and disclosed and (ii) you have lawful grounds to disclose it to us or that they have given you their permission to disclose it to us and for you to allow us and our third-party service providers to use and disclose it as set forth in this Policy.

## **Changes to Our Privacy Policy**

We may update this Policy from time to time. When we update this Policy, we will change the Effective Date at the top of the Policy and post the updated Policy on our Website. We encourage you to check back frequently for current information on how we are collecting, using and protecting your information. By continuing to use our Website or providing information to us after a Policy update, you agree to the privacy practices described in the updated Policy.

## **Contacting Us**

If you have questions or comments about this Policy, please email us at: [info@chelseastreet.com](mailto:info@chelseastreet.com).