

## Mill Creek Capital Advisors Privacy Policy

We are committed to protecting your privacy and, for that reason, we have adopted this Privacy Policy to explain our data collection, use, and disclosure practices for the Mill Creek web site and any other tools, products, or services provided by MCCA that link to or reference this Privacy Policy (collectively, the "Services"). The Services are owned and operated by Mill Creek Capital Advisors, LLC, a Delaware limited liability company ("MCCA," "we," "us," or "our").

If you reside in the State of California, please click [here](#) to learn more about your privacy rights. To the extent that there is a conflict between this Privacy Policy and the Privacy Notice for California Residents, the Privacy Notice for California Residents will prevail with respect to California Residents (as defined below) only.

This Privacy Policy applies to information MCCA collects through the Services, as well as other information provided to us online or offline by third parties, when we associate that information with customers or users of the Services. However, it does not apply to information collected from our employees, contractors, or vendors. It also does not apply to information that you ask us to share with third parties or is that collected by certain other third parties whose software or services are featured or included in the Services (as further described below). Additionally, if you are a client of MCCA, this Privacy Policy only applies to Personal Information that is not subject to our privacy notice for clients, available [here](#).

This Privacy Policy describes, among other things:

- Personal and other information we collect about you;
- How we use your information;
- How we may share your information with third parties; and
- Your choices regarding the personal information we collect about you.

### **Consent**

By accessing or using the Services, you consent to this Privacy Policy. If you do not agree with this Privacy Policy, please do not access or use the Services. Information gathered through the Services may be transferred, used, and stored in the United States or in other countries where we or the third parties who help us provide the Services are located. If you use the Services, you agree to the transfer, use, and storage of your Personal Information (as defined below) in those countries. The data protection and other laws of the United States and other countries might not be as comprehensive as those in your country. You agree that all transactions relating to the Services or MCCA, including the operation of the Services, are deemed to occur in the United States, where our servers are located.

### **Collection of Your Personal and Other Information**

When you register for, or use our Services, we collect Personal Information. By "Personal Information" we mean information that can identify or reasonably be linked to an individual, such as:

- Names;
- Personal or business addresses;

- Email addresses; and
- Phone numbers.

We may use technology from our Service Providers (as defined in Section 4 below) to collect user experience data, which reproduce your interactions with the Services, including mouse movements, page scrolling, and information you type (including Personal Information), screen taps, and other actions you take while using the Services. Data may include technical and usage data, as well as visual representations of actions you take while using the Services. We use these recordings to help us understand how users interact with our Services and to design a better user experience for you. You consent to our collection and use of user experience recordings.

We may use technology from our Service Providers to collect user chat data, which generates a transcript of your communication with us after our conversation has concluded. Data collected may also include technical and usage data. Our use of this data is limited to providing information you have requested, processing any transactions you have requested, helping us understand how users interact with our Services and to design a better user experience for you.

You may choose not to provide Personal Information, but this may prevent you from receiving certain features of the Services.

We also collect non-Personal Information relating to the Services, that is, information that does not personally identify an individual ("Non-Personal Information"). The Non-Personal Information we collect includes how you interact with the Services, information generally collected or "logged" by Internet websites or Internet services when accessed or used by users, and information about your web browser or device accessing or using the Services.

Examples of the Non-Personal Information we collect are:

- The pages of our website that you viewed during a visit;
- What information, content or advertisements you view or interact with using the Services;
- Language preferences;
- The city and state in which you are located (but not your precise geographic location); and
- Unique identifiers that are not connected and cannot reasonably be connected to your identity.

We will not use Non-Personal Information to try to identify you, and if we associate any Non-Personal Information with information that personally identifies you, then we will treat it as Personal Information. As discussed in more detail below, we sometimes use cookies and other automatic information gathering technologies to gather Non-Personal Information.

Information collected by the Services may be collected by us or one of the third parties we utilize in providing the Services (as further described below).

### **Use of Your Information**

We may use the information we collect to:

- Assist us in providing, managing, maintaining, and securing the Services and the systems used to provide the Services;
- Set up, maintain, and protect accounts to use the Services;
- Improve our online operations;
- Process transactions;
- Provide customer service;

- Communicate with you, such as provide you with account- or transaction-related communications, or other newsletters, RSS feeds, and/or other communications relating to the Services;
- Prevent fraud or other misuse;
- Perform research and analysis aimed at improving our products and services and developing new products or services; and
- Comply with our legal obligations and exercise our legal rights.

### **Disclosure of Your Information**

We do not sell your Personal Information but we may disclose your Personal Information to third parties as described below.

We may disclose Personal Information to provide the Services, or when you authorize or instruct us to do so, for example when you use the Services to submit content or profile information. We may also disclose Personal Information and Non-Personal Information to Service Providers. By "Service Providers" we mean companies, agents, contractors, service providers, or others engaged to perform functions on our behalf (such as processing of payments, provision of data storage, hosting of our website, marketing of our products and services, and conducting audits). When we use a Service Provider, we require that the Service Provider use and disclose the Personal Information and Non-Personal Information received from us only to provide their services to us or as required by applicable law.

We may also disclose Personal Information and Non-Personal Information to API Providers. By "API Provider" we mean a licensor of software that we include in, or use with, the Services, including an application programming interface ("API") or software development kit ("SDK"), that provides a specialized function or service to us and that requires the transmission of Personal Information and/or Non-Personal Information to the API Provider. API Providers may have the right to use Personal Information and Non-Personal Information about you for their own business purposes. Use and disclosure of Personal Information and Non-Personal Information by an API Provider is described in its privacy policy. See Section 5 below for some of the key API Providers we use.

We may partner with advertisers to provide you with special offers, or to advertise products or services to you. If you redeem or respond to an offer, we may provide your Personal Information to the advertising partner, including your name, email address, gender, and year of birth. If you answer questions or fill out surveys from an advertiser, we may share information with that advertiser. The advertising partner's privacy policy will govern their use of your information, which may include marketing of other products or services to you. You should read each advertiser's privacy policy before providing information to that advertiser.

We may also disclose your Personal Information to third parties when we believe, in good faith and in our sole discretion, that such disclosure is reasonably necessary to (a) enforce or apply the terms and conditions of the Services, including investigation of potential violations thereof, (b) comply with legal or regulatory requirements or an enforceable governmental request, (c) protect the rights, property or safety of us, our users or other third parties, (d) submit insurance claims, cooperate with insurance investigations, and fulfil insurance subrogation activities, (e) prevent a crime or protect national security, or (e) detect, prevent or otherwise address fraud, security or technical issues.

We reserve the right to transfer information (including your Personal Information) to a third party in the event of a sale, merger, or transfer of all or substantially all of the assets of our company relating to the Services, or in the unlikely event of a bankruptcy, liquidation, or receivership of our business. We will use commercially reasonable efforts to notify you of such transfer, for example via email or by posting notice on our website.

Lastly, we may also disclose Non-Personal Information, aggregated with information about our other users, to our clients, business partners, merchants, advertisers, investors, potential buyers and

other third parties if we deem such disclosure, in our sole discretion, to have sound business reasons or justifications.

### **Cookies and Automatic Information Gathering Technologies**

Every time you use the Services (e.g., access a Service webpage, or navigate to a specific location within the Service mobile app), we collect Personal Information and Non-Personal Information (discussed above in Section 2) regarding that use. For example, to improve our Services, we collect how, when, and which parts of the Services or their features you use. Also, we may use your device's unique identifier (UDID) or other unique identifiers to assist us in collecting and analyzing this data.

To assist us in collecting and storing this Personal Information and Non-Personal Information, we may employ a variety of technologies, including "Cookies," local browser storage, and "web beacons," "pixels," or "tags." A "Cookie" is a small amount of data a website operator, or a third party whose content is embedded in that website, may store in your web browser and that the website operator or, as applicable, the third party, can access when you visit the website. A web beacon, pixel or tag is a small, usually-transparent image or script placed on a web page that allows the operator of that image or script, which may be the operator of the website you visit or a third party, to read or write a Cookie.

Your operating system and web browser may allow you to erase information stored in Cookies and local browser storage. But if you do so, you may be forced to login to the Services again and you may lose some preferences or settings. You may also be able to set your browser to refuse all website storage or to indicate when it is permitted, but some features of our Services may not function properly without it. We may use Cookies to keep you logged in, save your preferences for the Services, and to collect information about how you use our Services.

More information about managing Cookies is available [here](#). To learn how to manage privacy and storage settings for your local browser storage, please refer to the end user documentation for your browser.

An API Provider may collect information automatically, in which case Personal Information and Non-Personal Information it receives are subject to the API Provider's privacy policy. Some API Providers may allow you to opt out of certain collection and/or uses of your information. You can read more here:

[Google Analytics](#)

[Meta Pixel](#).

### **Transparency and Choice; Do Not Track Signals**

You may request access to your Personal Information by sending an email to [mtang@millcreek.com](mailto:mtang@millcreek.com). We will try to locate and provide you with your Personal Information and give you the opportunity to correct this data, if it is inaccurate, or to delete it, at your request. But, in either case, we may need to retain it for legal reasons or for legitimate business purposes. You may also remove any content that you post to the Services using the deletion or removal options within the Service. However, we (and you) are not able to control information that you have already shared with other users or made available to third parties through the Services.

If you need further assistance with removing any content you posted through the Services, you can email us at [mtang@millcreek.com](mailto:mtang@millcreek.com). Removal of your posted content may not ensure complete or comprehensive removal from our computer systems.

We ask individual users to identify themselves and the information requested to be accessed, corrected, or removed before processing such requests, and we may decline to process requests that are unreasonably repetitive or systematic, require disproportionate technical effort, jeopardize the privacy of others, would be extremely impractical (for instance, requests concerning information residing on backups), or relate to information that is not associated with your Personal Information. In any case, where we provide information access, correction or deletion, we perform this service free of charge, except if doing so would require a disproportionate effort.

Please be aware that if you ask us to delete your Personal Information, you may not be able to continue to use the Services. Also, even if you request that we delete your Personal Information, we may need to retain certain information for a limited period of time to satisfy our legal, audit and/or dispute resolution requirements.

The Global Privacy Control ("GPC") is a browser extension that automatically indicates a consumer's preference to opt out of the sale of Personal Information or the sharing of Personal Information for targeted advertising. Because we do not sell Personal Information or share Personal Information for targeted advertising, our Services do not adhere to the GPC standard.

We also support the development and implementation of other standardized "do not track," universal opt-out mechanism, or similar browser features that provide customers with control over the collection and use of information about their web-browsing activities. Once other standardized "do not track" features are widely recognized, we intend to adhere to those features accordingly.

You can opt out of receiving marketing e-mails from us by clicking on the "unsubscribe" link in the e-mails. Please note that it may take up to ten (10) business days for your opt-out request to be processed. Also, even if you opt out of marketing e-mails, we may continue to send you certain account-related e-mails, such as notices about your account and confirmations of transactions you have requested.

### **Certain State Residents**

You may have heard of the certain state laws including the Colorado Privacy Act (CPA), Connecticut Data Privacy Act (CTDPA), Delaware Personal Data Privacy Act, Florida Digital Bill of Rights (FDBR), Indiana Consumer Data Protection Act, Iowa Consumer Data Protection Act (ICDPA), Kentucky Consumer Data Act (KCDPA), Maryland Online Data Privacy Act, Minnesota Data Privacy Act, Montana Consumer Data Privacy Act, Nebraska Data Privacy Act, New Hampshire Consumer Data Privacy Act, New Jersey Consumer Data Privacy Act, Oregon Consumer Privacy Act, Rhode Island Data Transparency and Privacy Protection Act, Tennessee Information Protection Act, Texas Data Privacy and Security Act, Utah Consumer Privacy Act, and Virginia Consumer Data Protection Act which provide certain rights to Colorado, Connecticut, Delaware, Florida, Indiana, Iowa, Kentucky, Maryland, Minnesota, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Rhode Island, Tennessee, Texas, Utah, and Virginia residents in connection with their Personal Information. Our Services are not currently subject to the comprehensive privacy laws of Colorado, Connecticut, Delaware, Florida, Indiana, Iowa, Kentucky, Maryland, Minnesota, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Rhode Island, Tennessee, Texas, Utah, or Virginia. However, we do provide notice and transparency about our collection and use of Personal Information as described in Privacy Policy.

### **Residents of Canada**

If you have an objection to the use of your Personal Information as described in this Privacy Policy, you may file a complaint by sending an email to [mtang@millcreek.com](mailto:mtang@millcreek.com). We will attempt to accommodate your objection or complaint, but you understand that, to the extent you object to our processing of Personal Information that is necessary for us to provide the Services to you, certain features and functionalities of the Services may no longer be available to you. Nothing in this Privacy Policy prejudices your rights to file a complaint with the Office of the Privacy Commissioner of Canada, and/or with any other applicable data protection authorities.

### **Residents of Nevada**

We do not sell your Personal Information. However, you may contact us at [mtang@millcreek.com](mailto:mtang@millcreek.com) with questions.

## **Children**

The Services are not intended for users under 18 years of age. We do not knowingly collect Personal Information from users under 18 years of age. We do not authorize users under 18 years of age to use the Services.

## **Information Security**

We utilize reasonable information security measures to safeguard your Personal Information against unauthorized access, modification, or destruction. For example, we utilize Transport Layer Security (TLS) or similar encryption technology when sensitive data is transmitted over the Internet, and use firewalls to help prevent external access into our network. However, no data transmission over the Internet and no method of data storage can be guaranteed to be 100% secure. Therefore, while we strive to use commercially acceptable means to protect your Personal Information, we cannot guarantee its security.

We restrict access to Personal Information in our possession to our employees, Service Providers, and API Providers who need to know that information in order to operate, develop, improve or support our Services. If we share Personal Information with Service Providers or API Providers, we require that they also use reasonable information security measures to safeguard your Personal Information.

## **Third Party Websites**

Please note that the Services may link or integrate with third-party sites, services or apps. We are not responsible for the privacy or security policies or practices or the content of such third parties. Accordingly, we encourage you to review the privacy and security policies and terms of service of those third parties so that you understand how those websites collect, use, share and protect your information.

## **Changes to this Policy**

We may modify or update this Privacy Policy periodically with or without prior notice by posting the updated policy on this page. You can always check the "Last Updated" date at the top of this document to see when the Privacy Policy was last changed. If we make any material changes to this Privacy Policy, we will notify you by reasonable means, which may be by e-mail or posting a notice of the changes on our website prior to the changes becoming effective. We encourage you to check this Privacy Policy from time to time. IF YOU DO NOT AGREE TO CHANGES TO THIS PRIVACY POLICY, YOU MUST STOP USING THE SERVICES AFTER THE EFFECTIVE DATE OF SUCH CHANGES (WHICH IS THE "LAST UPDATED" DATE OF THIS PRIVACY POLICY).

## **Questions**

To ask questions about our Privacy Policy or to file a complaint, contact us at:

Mill Creek Capital Advisors, LLC  
161 Washington Street, Suite 1500  
Conshohocken, PA 19428  
Email: [mtang@millcreek.com](mailto:mtang@millcreek.com)

## **Privacy Notice for California Residents**

This Privacy Notice for California Residents (the “**Notice**”) supplements the information contained in our Privacy Policy and applies only if you reside in the State of California (a “**California Consumer**”). Additionally, if you are a client of MCCA, this Notice only applies to Personal Information that is not subject to our privacy notice for clients, available [here](#).

For purposes of this Notice “Sell,” “Selling,” “Sale,” or “Sold,” means selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, Personal Information to another business or a third party for monetary or other valuable consideration.

“Share”, “Shared,” or “Sharing” means sharing, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, Personal Information to a third party for Cross-context Behavioral Advertising, whether or not for monetary or other valuable consideration.

“Cross-context Behavioral Advertising” means the targeting of advertising to a consumer based on that consumer’s Personal Information obtained from activity across businesses or distinctly-branded websites, applications, or services, other than the business or distinctly-branded website, application, or service with which the consumer intentionally interacts. (In other words, if we send you an ad based solely on your interaction with us or our Services, this is not Cross-context Behavioral Advertising.)

“Sensitive Personal Information” means Personal Information that is not publicly available and reveals one or more of the following:

- A consumer’s Social Security, driver’s license, state identification card, or passport number;
- A consumer’s account log-in, financial account, debit card or credit card number in combination with any required security or access code, password, or credentials allowing access to an account;
- A consumer’s precise geolocation;
- A consumer’s racial or ethnic origin, religious or philosophical beliefs, or union membership;
- The contents of a consumer’s mail, email, and text messages unless we are the intended recipient of the communication;
- A consumer’s genetic or biometric data;
- A consumer’s neural data; or
- Personal Information collected and analyzed concerning a consumer’s health, sex life, or sexual orientation.

“Verifiable Request” means that the identifying information provided by a consumer in connection with a request matches the Personal Information of the consumer already maintained by us. Identifying information includes email address, phone number, mailing address or other information we already have on file.

### **1. Information We Collect**

In the past twelve (12) months, MCCA has collected the following categories of Personal Information from California residents:

<b>Category</b>	<b>Examples</b>	<b>Collected</b>
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	Yes

B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.  Some personal information included in this category may overlap with other categories.	NO
C. Protected classification characteristics under California or federal law.	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, veteran or military status, genetic information (including familial genetic information).	NO
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	NO
E. Biometric information.	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.	NO
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES
G. Geolocation data.	Physical location or movements.	NO
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
I. Professional or employment-related information.	Current or past job history or performance evaluations.	NO
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	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.	NO

K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO
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In the past twelve (12) months, MCCA has not collected Sensitive Personal Information from California residents.

MCCA obtains this Personal Information from the following types of sources: Directly from you, such as from forms you submit through the Services. Indirectly from you, such as information automatically sent by your web browser.

**2. Use of Personal Information**

MCCA may use or disclose the Personal Information we collect for one or more of the following "Business Purpose(s):"

- To fulfill or meet the reason you provided the information;
- To provide, manage, maintain, and secure the Services and the systems used to provide the Services;
- To set up, maintain, and protect accounts to use the Services;
- To improve our online operations;
- To process transactions;
- To provide customer service;
- To communicate with you, such as provide you with account- or transaction-related communications, or other newsletters, RSS feeds, and/or other communications relating to the Services;
- To prevent fraud or other misuse;
- To perform research and analysis aimed at improving our products and services and developing new products or services;
- To comply with our legal obligations and exercise our legal rights;
- To respond to your requests under the California Consumer Privacy Act of 2018 (the "CCPA"), as amended;
- For any other purpose described to you when we collect your Personal Information; and
- For any other acceptable purposes as set forth in the CCPA.

To the extent that we generate any de-identified data sets based on the Personal Information that we collect or receive through the Services, we will never re-identify any such de-identified Personal Information.

Unless we notify you otherwise, we will not collect additional categories of Personal Information, nor use the Personal Information we collect for any other materially different, unrelated, or incompatible purposes.

**3. Retention of Personal Information**

We retain each category of your Personal Information for no longer than is reasonably necessary for one or more Business Purposes, subject to your right to request we delete your Personal Information. Due to the nature of the services, it is not possible to predict the length of time that we intend to retain your Personal Information. Instead, we use the following criteria to determine whether it remains reasonably necessary to retain your Personal Information for one or more disclosed Business Purpose(s):

- whether not there is a retention period required by statute or regulations;

- pendency of any actual or threatened litigation for which we are required to preserve the information; and
- generally accepted best practices in our industry.

When we determine that it is no longer reasonably necessary to retain your Personal Information for one or more disclosed Business Purpose(s) based on the above criteria, we will delete your Personal Information.

#### **4. Disclosure of Personal Information**

MCCA may disclose Personal Information to our "service providers", to our "contractors", and to "third parties" (each as defined by the CCPA) for a Business Purpose. When we disclose Personal Information for a Business Purpose, we enter into an agreement with the receiving party that describes the purpose for sharing the Personal Information, and that requires the receiving party to keep that Personal Information confidential. In the case of disclosures to our "service providers," our "service providers" are obligated not to use the Personal Information for any purpose other than performing the services according to their agreement with us. In the case of our "contractors", our "contractors" are obligated not to use the Personal Information for any purpose unrelated to the business purpose for which we've engaged them.

We may disclose your Personal Information with the following categories of entities: service providers and contractors.

In the past twelve (12) months, MCCA has not Sold or Shared any Personal Information about its California Consumers.

#### **5. Your Rights and Choices**

If you are a California Consumer, you may request information about our collection, use, disclosure and Sale of your Personal Information over the past twelve (12) months, whether or not it was collected electronically. If you submit a Verifiable Request, we will provide you with information regarding:

- the categories of Personal Information we have collected about you; the categories of sources from which your Personal Information was collected; our Business Purpose for collecting, Selling, or Sharing your Personal Information; the categories of third parties with whom we disclose that Personal Information; and the specific pieces of Personal Information we collected about you; and
- if we Sold, Shared, or disclosed your Personal Information for a Business Purpose: what categories of Personal Information we Sold or Shared, and to which categories of recipients we Sold or Shared it; and what categories of Personal Information we disclosed for a Business Purpose, and to which categories of recipients we disclosed it.

You also have the right to request a copy of your Personal Information, and/or to request that we transmit your Personal Information to another entity. To the extent technically feasible, we will comply with your request and provide and/or transmit your Personal Information in a structured, commonly used, machine-readable format.

You also have the right to request that we delete any of your Personal Information that we collect or maintain by submitting a Verifiable Request. We may deny your deletion request if retaining your Personal Information is necessary for us or our "service providers" or "contractors" to:

- Complete the transaction for which we collected your Personal Information, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, provide goods or services that you requested, take actions reasonably anticipated by you within the context of our ongoing business relationship with you, or otherwise perform our contract with you;
- Help to ensure security and integrity to the extent the use of your Personal Information is reasonably necessary and proportionate for those purposes;
- Debug products to identify and repair errors that impair existing intended functionality;

- Exercise free speech, ensure the right of another consumer to exercise that consumer's right of free speech, or exercise another right provided for by law;
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.);
- Engage in public or peer-reviewed scientific, historical, or statistical that conforms or adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the ability to complete such research, if you previously provided informed consent;
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us and compatible with the context in which you provided the information; or
- Comply with a legal obligation.

You further have the right to request that we correct any of your Personal Information that is inaccurate by submitting a Verifiable Request. We will correct any inaccurate Personal Information pursuant to your request to the extent possible using commercially reasonable efforts. We may deny your correction request if the Personal Information is accurate. We may also delete your Personal Information instead of correcting it to the extent such deletion would not negatively impact you.

If you choose to exercise a privacy right under the CCPA, you have the right not to receive discriminatory treatment.

You may submit a Verifiable Request for the information listed above, or exercise any of your rights enumerated under this Notice, by calling us at 610-941-7700, or by completing a [form](#) on our website, or by email to [mtang@millcreek.com](mailto:mtang@millcreek.com), or by postal mail to 161 Washington Street, Suite 1500, Conshohocken, PA 19428. You may also submit a Verifiable Request on behalf of your minor child.

After we receive your Verifiable Request, we will provide to you, in writing and free of charge (unless your request is excessive, repetitive, or manifestly unfounded), the requested information for the 12-month period preceding your request (unless you specifically request disclosure beyond such 12-month period, in which case, we will process your request with respect to Personal Information we have collected during the time period you specify, provided that (a) the earliest date that your request may apply to is January 1, 2022, and (b) processing your request does not require disproportionate effort). You can choose to have this information delivered to you by postal mail, electronically. We will try to respond to your verified request within forty-five (45) days of receipt, but if we require more time (up to another forty-five (45) days) we will inform you of the reason and extension period in writing. Please note that we are not required to comply with your request for information more than twice in any 12-month period. If applicable, our response will explain the reasons why we cannot comply with your request.

MCCA does not and will not, without first obtaining your consent, Sell or Share Personal Information.

- Should you choose to exercise any of the rights enumerated under this Notice, we will not:
- Deny you goods or services;
  - Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties;
  - Provide you a different level or quality of goods or services; or
  - Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

However, please be aware that it may be a functional necessity for our Services to have Personal Information about you in order to operate, and we may not be able to provide some or all of our Services to you if you direct us to delete your Personal Information.