



April 2021

Jackson Square Partners Privacy Notice

Jackson Square Partners, LLC is committed to protecting the privacy of personally identifiable information (“PII”) of identifiable individuals who visit www.jspartners.com (the “Site”) and inquire about or use services associated with our business available through our Site, or express interest in our business.

FACTS	WHAT DOES JACKSON SQUARE PARTNERS, LLC (“Jackson Square”) DO WITH YOUR PERSONAL INFORMATION?
WHY?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
WHAT?	The types of personal information we collect and share depend on the product or service you have with us. This information can include: <ul style="list-style-type: none"> ▪ Social Security number ▪ account balances ▪ account transactions ▪ transaction history ▪ wire transfer instructions ▪ checking account information When you are <i>no longer</i> our customer, we continue to share your information as described in this notice.
HOW?	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons they choose to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Jackson Square share?	Can you limit this sharing?
For our everyday business purposes – such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes – to offer our products and services to you	No	We don't share
For joint marketing with other financial companies	No	We don't share
For our affiliates' everyday business purposes – information about your transactions and experiences	No	We don't share
For our affiliates' everyday business purposes – information about your creditworthiness	No	We don't share
For our affiliates to market to you	No	We don't share
For non-affiliates to market to you	No	We don't share
Questions?	Call (001) 415-635-0213 or email compliance@jspartners.com	

WHAT WE DO	
How does Jackson Square Partners, LLC protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal, English and European laws. These measures include computer safeguards and secured files and buildings.
How does Jackson Square Partners, LLC collect my personal information?	We collect your personal information, for example, when you: <ul style="list-style-type: none"> ▪ Open an account ▪ Pay us by check ▪ Provide account information ▪ Make a wire transfer ▪ Give us your contact information
Why can't I limit all sharing?	Federal law gives you the right to limit only <ul style="list-style-type: none"> ▪ sharing for affiliates' everyday business purposes- information about your creditworthiness ▪ affiliates from using your information to market to you ▪ sharing for nonaffiliates to market to you <p>Other national or state laws and individual companies may give you additional rights to limit sharing.</p>
DEFINITIONS	
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> ▪ Our affiliates include companies with the Jackson Square Partners name or California Street Partners name
Nonaffiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> ▪ Jackson Square Partners does not share with nonaffiliates so they can market to you.
Joint marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. <ul style="list-style-type: none"> ▪ Jackson Square Partners does not jointly market.
Additional information Regarding the Processing of Personal Data	The Schedule to this document contains the additional information we are required to provide to you under the General Data Protection Regulation (EU) 2016/679 and/or the UK Data protection Act 2018, as an individual based either in the European Union or the United Kingdom, as well as under U.S. state privacy laws, including but not limited to the California Consumer Privacy Act with respect to individuals in California.

SCHEDULE

Applicability	Additional information for individual clients based in the European Union, the United Kingdom, or applicable U.S. states with comprehensive privacy laws including but not limited to California.
Reasons we process your personal information	<ul style="list-style-type: none"> ● For our every day business purposes – such as to process your transactions, maintain your account(s), respond to court orders and legal investigations. These processes are necessary to perform the contract you have with us to invest on your behalf and for our legitimate interests in complying with any applicable Federal law or state laws. ● For our marketing purposes – to offer our products and services to you. We have a legitimate interest in reasonably informing you about our products and services.
Who do we share your personal information with?	We share your personal information for our every day business purposes to accountants, auditors, banks, brokers, legal and administrative service providers as well as regulatory authorities and law enforcement agencies.
Your rights and how to contact us	<p>We are committed to providing individuals with reasonable and appropriate access to personal data. If you believe that we are processing personal data about you and wish to have access to that information, we can provide you with that data or at least an explanation of why we cannot do so in the particular context, such as when responding to the request would be unreasonably expensive. We are happy to correct inaccurate data or delete information that is not appropriate to retain. Please also let us know if you have any questions, concerns, disputes, or issues.</p> <p>If you make a request related to personal data about you, you may be required to supply a valid means of identification as a security precaution. We will process your request within the time provided by applicable law.</p> <p>You also have certain rights regarding your personal data, which may be subject to limitations and restrictions and which vary by jurisdiction, including the right to:</p> <ul style="list-style-type: none"> ● request access to and rectify or erase the personal information that we hold, or restrict or object to certain processing of your information by us; and ● request that we transfer your personal information in a structured and machine-readable format to a third party, in some circumstances. <p>If you wish to exercise one of these rights, please contact us at Sean Kreiger, (001) 415-635-0213 or email compliance@jspartners.com.</p>
International transfer	<p>Jackson Square is established and operates from the USA. This means that any personal information processed by us will be processed in the USA. The European Commission has not decided that the USA offers an adequate level of protection for personal information, but we will ensure your personal information is adequately protected.</p> <p>Your personal information will be transferred to the USA and stored by us only upon either of the following conditions;</p> <ul style="list-style-type: none"> ● you have explicitly consented to the proposed transfer, after having been informed of the possible risks of such transfers. If you give us your consent, you have the right to withdraw it at any time by contacting us using one of the methods set out above; or ● the transfer is necessary for the performance of a contract between yourself and Jackson Square, including the provision of reports and payments, or the implementation of pre-contractual measures taken at your request, including KYC and investment diligence.
Data Retention	Your personal information will not be held by Jackson Square for longer than necessary and in accordance with our Books and Records Policy.
Complaints	In the event that you have a complaint that is not resolved by us to your satisfaction you may refer the matter to your local data protection authority.

Our Site and Use of Cookies

We use various technologies to collect other types of information, including PII, automatically. For example, in order to measure the usefulness and efficiency of our Site, we automatically track certain information from all visitors to our Site. The types of information we might track may include the Internet address that you just came from, which Internet address you go to, what browser you are using, your IP address, your internet service provider, date and timestamp information, or clickstream information.

Additionally, like most interactive websites, we use "cookies" on certain pages. "Cookies" are small data files that are stored on your hard drive that store certain information accessible to our Site. These technologies help us recognize you, customize your experience on the Site and analyze your use of the Site to make it more useful to you. By visiting our Site, you agree to our use of cookies. For more details, please refer to our Cookie Policy.

You can refuse the use of cookies by selecting the appropriate browser setting. If you opt-out, please note that your experience using the Site may not be optimal, and you may not be able to use certain features on our Site. For information on how to remove or manage cookie functions and adjust your privacy and security preferences, access the "help" menu on your internet browser, or visit <http://www.aboutcookies.org/how-to-control-cookies>.

We also use analytics providers, such as Google Analytics to help us evaluate the Site. To opt out of the aggregation and analysis of data collected about you on the Site by Google Analytics, visit <https://tools.google.com/gaoptout> and download and install the Google Analytics Opt-out Browser Add-on.

Your EU Data Subject Rights

The European Union's General Data Protection Regulation ("GDPR") is a sweeping piece of legislation that grants EU residents increased control over their PII. The GDPR allows consumers to access their PII and find out details of how that data is processed, to rectify inaccurate PII, to have their data erased (when certain conditions are met), to restrict processing of their data, and more. It requires affected companies to create processes to comply with and facilitate consumer data requests, to update their privacy policies, and to ensure that PII is secured.

Specifically, the GDPR and other national privacy laws provide data subjects with certain rights regarding their PII. If you are an individual who resides in the EU and whose PII is collected and processed by JSP, you have the right to:

- Request access to your data
- Rectify your data
- Take your data (in a readable, "portable" format) to another service provider
- Erase your PII
- Restrict or object to the processing of your PII
- Lodge a complaint with a Member State Supervisory Authority
- Withdraw previously given consent to collect and process PII (which will not impact PII processed before the withdrawal)

PII Rights for California Residents

The California Consumer Privacy Act ("CCPA") requires us to make certain additional disclosures and provides California residents with the ability to request additional information about their PII. If you are a California resident and it is determined that the CCPA applies to you, this section details those rights, how you may exercise them, and what JSP will do in response. Please note that the rights under the CCPA do not apply to PII collected, processed, sold or disclosed pursuant to Gramm-Leach-Bliley Act (Public Law 106-102) and Fair Credit Reporting Act (12 CFR 1022).

If you are an individual who resides in California and whose PII is collected and processed by JSP, you may have the right to:

- Request that we disclose, free of charge, the categories and specifics of the PII we collect about California residents, the sources from which the PII was collected (and/or, if applicable, sell or otherwise disclose to a third party), and the business purpose for collecting PII.
- Choose to opt-out of the sale of PII. Currently, however, JSP does not sell PII.
- Request that we delete the PII we have collected. Following our verification of the request, we will comply with the request and delete any or all the PII in our possession that we collected from the California resident and/or any or all such PII in the possession of our service providers, unless otherwise restricted by law or regulation.

Non-Discrimination for Exercising Your PII Rights

We follow the requirements of California Civil Code §1798.125, and will not discriminate against any consumer who exercises the rights set forth in this privacy policy.

Questions or Concerns and Exercising Your Data Subject Rights

If you have any questions or concerns regarding the information in this privacy policy or would like to exercise any of your rights set forth in this privacy policy, please contact JSP at +1.415.635.0220 or info@jspartners.com. Please include a description of what right you want to exercise and the information to which your request relates. Please note that you may only make a disclosure request twice within a 12-month period.

If you think we have not complied with the requirements of the GDPR as it applies to your personal data, you have a right to lodge a complaint with any data protection supervisory authority in the EU. One such Supervisory Authority is the ICO The Information Commissioner's Office (ICO) in the UK: casework@ico.org.uk or 0303 123 1113 / +44 1625 545 700; www.ico.org.uk.

You can find details of other EU Supervisory Authorities here: https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm.

Verifying Your Identity

If you choose to contact us with a request, you will need to provide us with identifying information that matches the PII we currently have about you.

Authorized Agent

You have the right to appoint an authorized agent to exercise your rights on your behalf. If you would like to do so, please contact JSP at +1.415.635.0220 or info@jspartners.com.

Accessibility Information

For consumers with disabilities who need to access this policy in an alternative format, please contact JSP at +1.415.635.0220 or info@jspartners.com.

Changes To This Privacy Notice

From time to time we may update this privacy notice. If revisions are made to the privacy notice, we will update the statement with a new revision date.