

FACTS**WHAT DOES SCS CAPITAL MANAGEMENT LLC 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:

- Social Security number
- Contact Information, such as name, address, and email address
- Government issued identifiers
- Professional, educational, or employment-related information
- Asset and income related information
- Account Information, such as account balances and transaction history
- Assets, Investment experience, risk tolerance and account information

When you are *no longer* 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 SCS Capital Management LLC chooses to share; and whether you can limit this sharing.

| Reasons we can share your personal information | Does SCS Capital Management LLC 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 | Yes | No |
| For joint marketing with other financial companies | No | We don't share |
| For our affiliates' everyday business purposes— information about your transactions and experiences | Yes | No |
| For our affiliates' everyday business purposes— information about your creditworthiness | No | We don't share |
| For nonaffiliates to market to you | No | We don't share |

Questions?

Call 617-204-6400 or go to www.scsfinancial.com

Who we are

Who is providing this notice?

SCS Capital Management LLC

What we do

How does SCS Capital Management LLC protect my personal information?

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.

How does SCS Capital Management LLC collect my personal information?

We collect your personal information, for example, when you

- open an account or give us your income information
- tell us about your portfolio or
- deposit, withdraw or transfer money
- provide employment information and history
- provide account information
- give us your contact information
- make a wire transfer or money movement authorization
- share your government-issued ID or your driver's license
- enter into an investment advisory contract with us
- subscribe to investment funds

We collect your personal information from others, such as our affiliates or the custodians of your accounts.

Why can't I limit all sharing?

Federal law gives you the right to limit only

- 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

State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.

Definitions

Affiliates

Companies related by common ownership or control. They can be financial and nonfinancial companies.

- *Our affiliates include Focus Operating, LLC and Focus Risk Solutions, LLC.*

Nonaffiliates

Companies not related by common ownership or control. They can be financial and nonfinancial companies.

- *SCS Capital Management LLC 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.

- *SCS Capital Management LLC does not jointly market.*

Other important information

- If you are a California resident, California law may provide you with additional rights. To learn more about your California privacy rights under the California Consumer Privacy Act ("CCPA") as amended by the California Privacy Rights Act ("CPRA"), you can access our CCPA Privacy Notice on our website.