

FOR RESIDENTS OF CALIFORNIA

If you are a resident of California, this notice applies to you and supplements the *COMPANY* Privacy Policy. This notice is intended to provide certain information to you as required by the California Consumer Privacy Act of 2018 (“CCPA”).

This notice applies to information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with you or your household such as your 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 (“personal information”). Personal information does not include publicly-available information and certain other information that is regulated by other applicable laws.

Your Rights

Right to Know

You have the right to request that we disclose certain information to you about our collection of your personal information. Such information shall cover the 12-month period preceding our receipt of your request. Upon our receipt of your verified request, we will provide you with the following:

- The categories of personal information we have collected about you
- The categories of sources from which we have collected your personal information
- Our business or commercial purpose(s) for collecting or selling your personal information
- The categories of third parties with whom we have shared your personal information; and
- The specific pieces of personal information we have collected about you

You have the right to request that we disclose certain information to you about our disclosures of your personal information. Such information shall cover the 12-month period preceding our receipt of your request. Upon our receipt of your verified request, we will provide you with the following:

- The categories of personal information we have collected from you
- The categories of personal information that we disclosed about you for a business purpose

Right to Delete

You have the right at any time to request that we delete your personal information. However, in some cases we cannot delete all or some of your personal information as required or permitted by applicable laws.

Right to Non-Discrimination

We will not discriminate against you for exercising your rights under the CCPA, such as denying you products and services, charging you different rates or prices including use of discounts or penalties, or suggesting or providing a different level of service or quality of products to you. However, we may charge a different price or provide a different level or quality of products and services only if the price or difference is directly related to the value provided to you by your personal information.

We may offer you financial incentives, including payments to you as compensation, for collecting, selling, or deleting your personal information. We also may offer a different price, rate, level, or quality

of goods or services to the consumer if that price or difference is directly related to the value provided to you by your personal information.

Contact:

To submit a request to exercise any of your rights provided in this notice, please contact:

For further inquiries about this Privacy Policy, please contact NAL's Privacy Officer at:

privacy@nal.ca

Depending on the nature of your request, we may have to verify your identity when you contact us.

We endeavor to respond to your request as soon as we can. If we are not able to respond to your request within 45 days, we will let you know that we may require additional time (up to 90 total days).

You may also use an authorized agent to exercise your rights on your behalf. If you wish to use an authorized agent, we require that your authorized agent provides written proof to us that he or she is authorized to act on your behalf, and we may also require your authorized agent to verify his or her own identity. To appoint an authorized agent, please contact us at the above address/

We are not able to respond to more than one "Right to Know" request from a consumer in any 12-month period.

Information We Collect

Information we collect may include one or more of the following:

- **Identifiers** (e.g. real name, address, social security number)
- **Characteristics of protected classification under California or Federal law;**
- **Commercial information** (e.g. location and historical data concerning surface leases, mineral rights, history of ownership, history of communication regarding our business relationship and directly related information)

Our business purposes for collecting this information;

We collect and process your personal data for the purposes of logging our communications with our partners, consultants and other associated persons, and for relationship management and, in particular to:

- establish your identity and maintain our business relationship
- manage our relationship with you;
- manage our risks and help identify and investigate illegal activity, such as fraud;
- contact you, for example if we suspect suspicious activity on your account or need to tell you something important;
- comply with our legal obligations and assist government and law enforcement agencies or regulators

Third parties we share this information with:

We will not sell your personal data to any third parties. We may share your data with third parties where we have a legitimate interest or legal reason for doing so. These include:

- service providers, for example custodians, brokers, unit registry services or correspondent banks;
- those to whom we outsource certain functions, for example, statement production, information technology support;
- brokers, agents and advisers and persons acting on your behalf, for example your legal counsel or accountant
- other financial institutions, for example so that we can process a claim for mistaken payment;
- auditors;
- government and law enforcement agencies or regulators; and
- entities established to help identify illegal activities and prevent fraud.

We will share personal information with our affiliates for certain business purposes, only if the law permits it. Please note that we do NOT give your personal information, without your consent, to any organization outside of our member companies, for the purpose of that organization marketing their own products or services directly to you.

Date of last update: January 15, 2020