



# Privacy Policy

## PRIVACY NOTICE

This policy describes how Sabur collects, uses, and shares personal information when Sabur Providers provide services to clients. “Sabur” refers to ARPP, LLC, a registered investment advisor that provides investment advisory, family office, and other services to individuals, families, and institutional clients.

Any person or entity to whom a Sabur Provider provides or provided services or products is a “client.” Prospects who share personally identifiable information with a Sabur Provider are also treated as clients under the Privacy Notice.

## INTRODUCTION

Financial companies choose how they share consumer’s personal information. Federal law gives consumers the right to limit some, but not all, sharing. Federal law also requires Sabur Providers to tell clients what we do with their personal information. This Policy describes how Sabur Providers collect, use, and protects client’s personal information when we provide services to clients and describes how Sabur collects and uses information when Users use the Website as well as Terms of use of the Website. Please read this notice carefully to understand what we do.

## COLLECTING INFORMATION

Sabur Providers collect personally identifiable information from clients in the course of providing services. The types of personal information collected and shared depend on the services / products provided to the client. Information can include, but is not necessarily limited to, name and date of birth, social security number, marital status, contact information, account numbers, transaction history, income, payment history, employment history, assets, investment experience, risk tolerance, and account information, retirement assets, estate planning information, and family information.

## SHARING INFORMATION

Sabur Providers store, process, maintain, and use our clients’ personally identifiable information in order to provide clients support and services. Sabur Providers may share such information:

To complete transactions directed or authorized by the client or if requested by the client;

- To complete transactions directed or authorized by the client or if requested by the client;
- To provide services to the client;
- To contractors, vendors, and other third parties the Sabur Providers use to support their businesses and to provide services to clients, with those contractors, vendors, and third parties bound by contractual obligations to keep the information confidential and use it only for the purposes for which it was disclosed to them;
- As required by applicable law;

# Privacy Policy

- In circumstances we believe it is necessary to investigate, prevent, or react to illegal activities, suspected fraud, or violations; and



- With affiliates (i.e., a company under common control with said Sabur Provider) for their everyday business purposes if about clients' transactions and experiences.

Clients cannot limit the above sharing.

Sabur Providers may share clients' information with affiliates so that they may market to the clients. If we do so, federal law gives clients the right to limit such sharing. (State laws may give clients additional rights to limit sharing.) Please contact [advice@saburpwm.com](mailto:advice@saburpwm.com) to request to limit sharing.

Sabur Providers do not jointly market with non-affiliates and do not share information with nonaffiliates to market to clients, although a Sabur Provider may refer clients to a non-affiliate who a client may contact at their discretion.

## **SECURITY**

Sabur Providers take commercially reasonable steps to protect clients' information from loss, misuse, unauthorized access, disclosure, or destruction in accordance with applicable law. No Internet, e-mail or electronic operating system is ever fully secure or error free, so please take care in deciding what information is provided to Sabur Providers.

Please note that Sabur Providers do not send emails to clients requesting billing, login, user ID or password information. If a client receives an email requesting personal or account information, login, or passwords purporting to be from a Sabur Provider, we strongly advise clients to verify such communication is from a Sabur Provider. We ask that clients report any suspicious communications to us.

Sabur Providers take commercially reasonable steps to ensure that information remains secure when it is disposed of after it is no longer required to be maintained. Such steps shall include shredding paper documents and records prior to disposal, requiring off-site storage vendors to shred documents maintained in such locations prior to disposal, and destroying data contained on electronic media in such a manner that the Information can no longer be read or reconstructed.

## **MODIFICATIONS**

We may, in our sole discretion, modify the Privacy Notice from time to time. If we make material modifications, we will notify all our clients as required by applicable law.

## **CALIFORNIA RESIDENTS**

For Users who are California residents, California law may provide Users with additional rights regarding use of their personal information.

# **Privacy Policy**

This PRIVACY NOTICE FOR CALIFORNIA RESIDENTS supplements information contained in the Privacy



Policy of Sabur and applies solely to visitors, users, and others who reside in the State of California (“consumers” or “you”). “Sabur” refers to ARPP, LLC, a registered investment advisor that provides investment advisory, family office, and other services to individuals, families, and institutional clients. Sabur may also be referred to as “we.”

We adopt this notice to comply with the California Consumer Privacy Act of 2018 (“CCPA”) and other California privacy laws. Any terms defined in the CCPA have the same meaning when used in this notice.

#### **INFORMATION COLLECTED**

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device (“personal information”). In particular we may collect the following categories of personal information from our clients:

Category	Examples	Collected
A. Identifiers	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 voice recordings, iris or retina scans, keystroke, gait, or other physical patterns, and sleep,	YES
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement. The only reason why “Yes” has been indicated is because we capture your activity on our Websites.	YES
C. Protected classification characteristics under California or federal law.	Physical location or movements.	YES
	Audio, electronic, visual, thermal, olfactory, or similar information. The only reason why “Yes” has been	NO
	information through interactions.	
E. Biometric Information	Current or past job history or performance evaluations. The only reason “Yes” has been indicated is because we capture some job history.	NO
F. Internet or other similar network activity	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.	YES
G. Geolocation Activities	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO
H. Sensory Data	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 voice recordings, iris or retina scans, keystroke, gait, or other physical patterns, and sleep,	YES
I. Protected classification characteristics under California or federal law.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement. The only reason why “Yes” has been indicated is because we capture your activity on our Websites.	YES
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section	Physical location or movements.	NO





1232g, 34 C.F.R. Part 99))		
K. Inferences drawn from other personal information	Audio, electronic, visual, thermal, olfactory, or similar information. The only reason why “Yes” has been indicated is because we capture audio and electronic information through interactions.	NO
D. Commercial Information		

indicated is because we capture audio and electronic

## Privacy Notice -- California

Personal information does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA's scope, such as: health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data; and personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

We obtain the categories of personal information listed above from the following categories of sources: |

- Directly from our clients or their agents. For example, from documents that our clients provide to us related to the services for which they engage us.
- Indirectly from our clients or their agents. For example, through information we collect from our clients in the course of providing services to them.
- Directly and indirectly from activity on our websites <https://Saburpwm.com>. For example, from submissions through our website portal or website usage details collected automatically.
- From third parties that interact with us in connection with the services we perform.

### USE OF PERSONAL INFORMATION

We may use or disclose the personal information we collect for one or more of the following business purposes:

- To provide you with information, products or services that you request from us.
- To fulfill or meet the reason for which the information is provided.

- To provide you with email alerts, event registrations, and other notices concerning us that may be of interest to you.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collections.
- To improve our website and present its contents to you.
- For testing, research, analysis and product / service development.
- As necessary or appropriate to protect the rights, property, or safety of us, our clients or others.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

### **SHARING PERSONAL INFORMATION**

We may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

In the preceding twelve (12) months, we have disclosed the following categories of personal information for a business purpose:

**Category A:** Identifiers.

**Category B:** California Customer Records personal information categories.

**Category C:** Protected classification characteristics under California or federal law.

**Category I:** Professional or employment-related information.

We disclose your personal information for a business purpose to the following categories of third parties:

- Our affiliates.
- Service providers.
- Third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you.



SABUR DOES NOT SELL PERSONAL INFORMATION. IN THE PRECEDING TWELVE (12) MONTHS, WE HAVE NOT SOLD ANY PERSONAL INFORMATION.

## YOUR RIGHTS AND CHOICES

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

Access to Specific Information and Data Portability Rights: You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable request, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).

Deletion Request Rights. You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable request, we will delete (and direct our service providers to delete) your personal information from our records unless an exception applies.

Please note that we may deny your deletion request if retaining the information is necessary for us or our service providers to:

- Complete the transaction for which we collected the personal information, provide a service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 seq.).
- Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us.

- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Exercising Access, Data Portability, and Deletion Rights: To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us at the mail address or email address noted below.

Only you or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child. You may only submit a request for access or data portability twice within a 12-month period. Such request must (a) provide sufficient information that allows us to reasonably verify the person about whom we collected personal information or an authorized representative of the same, and (b) describe your request with sufficient detail that allows us to understand, evaluate, and respond to the request.

Please note that we cannot respond to requests or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. Sabur will only use personal information provided in the request to verify the requestor's identity or authority to make it. Making a verifiable consumer request does not require you to be a client or investor with us.

Response Time and Format: We endeavor to substantively respond to a verifiable California consumer request within forty-five (45) days of its receipt. If we require more time (up to another 45 days), Sabur will inform you of the reason and extension period in writing.

If you are a client or investor of ours, we will deliver our written response electronically (or mail if you have opted out of electronic delivery). If you are not a client or investor of ours, we will deliver our written response electronically or mail. Please note that any disclosures we provide will only cover the 12-month period preceding our receipt of the verifiable request. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to verifiable request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing the request.

## **NON-DISCRIMINATION**

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not (a) deny California consumers goods or services, (b) charge California consumers different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties, (c) provide California consumers with different level or quality of goods or services, or (d) suggest that California consumers may receive a different price or rate for goods or services or a different level or quality of goods or services.





However, Sabur may offer Californians certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels. Participation in a financial incentive program requires CA Individual's prior opt-in consent, which may be revoked at any time.

### **OTHER CALIFORNIA PRIVACY RIGHTS**

California's "Shine the Light" law (Civil Code Section § 1798.83) permits Users of Website that are California residents to request certain information regarding our disclosure of personal information to Privacy Policy Privacy Notice - California third parties for their direct marketing purposes. To make such a request, please send an email using contact information provided in this Policy.

### **CHANGES TO OUR PRIVACY NOTICE**

We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will notify you by email or through a notice on our website homepage.

### **CONTACT INFORMATION**

If you have any questions or comments about this notice, our Privacy Statement, the ways in which we collect and use your personal information, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

**Website:** [Saburpwm.com](http://Saburpwm.com)

**Email:** [advice@Saburpwm.com](mailto:advice@Saburpwm.com)

**Address:** Sabur Private Wealth Management / ARPP LLC

Attn: Compliance

950 E.State Hwy 114 Suite 160

Southlake, TX 76092

### **QUESTIONS**

If you have any questions, please contact our Compliance Department at [advice@Saburpwm.com](mailto:advice@Saburpwm.com) or call (469)702-8955

Effective August 14, 2023