



# Privacy Notice

## FACTS - What does Westwood 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 may include:

- Social Security Number
- Income
- Assets
- Investment Experience
- Account Transactions
- Risk Tolerance

**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 Westwood chooses to share; and, whether you can limit this sharing.

Reasons we can share your personal information	Does Westwood share?	Can you limit this sharing?
<b>For our everyday business purposes</b> - such as to process your transactions, maintain your account(s) or respond to court orders and legal investigations	Yes	No
<b>For our marketing purposes</b> - to offer our products and services to you	Yes	Yes
<b>For joint marketing with other financial companies</b>	Yes	No
<b>For our affiliates' everyday business purposes</b> - information about your transactions and experiences	Yes	No



Reasons we can share your personal information	Does Westwood share?	Can you limit this sharing?
For our affiliates' everyday business purposes - information about your creditworthiness	Yes	Yes
For our affiliates to market to you	Yes	Yes
For non-affiliates to market to you	Yes	Yes

### Additional information

For more details on how we protect your personal information, please visit our website at <https://westwoodgroup.com/privacy-policy/>

If you have questions or want to limit our sharing or marketing to you:

For Westwood Trust or Westwood Advisors, LLC clients, call Julie Cooper at 214.624.9621. For Westwood Management clients, call Rolanda Williams at 214.756.6930.

**Please note:** If you are a new customer, we can begin sharing your information 30 days from the date we sent this notice. When you are no longer our customer, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.



## Mail-in Form

If you have a joint account, your choice(s) will apply to everyone on your account unless you mark below.

- Apply my choices only to me
- Apply my choices only to my joint account holder

Mark any/all you want to limit:

- Do not use my personal information to market to me.
- Do not allow any of your affiliates to use my personal information to market to me.

**Name**

**Mail to:**

Westwood Holdings Group, Inc.  
ATTN: Data Privacy Group  
200 Crescent Court  
Suite 1200  
Dallas, Texas 75201



**Who is providing this notice?** Westwood Holdings Group, Westwood Management Corp., Westwood Trust, Westwood Advisors, LLC, Salient Capital, LP, Salient Advisors, LP and Broadmark Asset Management, LLC.

**How does Westwood 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 Westwood collect my personal information?** We collect your personal information, for example, when you

- Open an account
- Seek Financial Advice
- Seek Advice about your investments
- Tell us about your investment or retirement portfolio
- Give us your employment history

**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 non-affiliates to market to you

State laws and individual companies may give you additional rights to limit sharing.

**What happens when I limit sharing for an account I hold jointly with someone else?** Your choices will apply to everyone on your account - unless you tell us otherwise.

**How can I limit the Westwood's Affiliates' marketing to me?** You can limit the Affiliates' ability to market products and services to you based on your personal information (such as your income or account history) that they receive from us or other Affiliates by returning the form on the first page of this notice.

**How long does my election to limit the Affiliates' marketing remain in effect?** Your election to limit marketing to you by our Affiliates will continue indefinitely, until you notify us to change your election.



## Definitions

**Affiliates:** Companies related by common ownership or control. They can be financial and non-financial companies. Our affiliates include Westwood Management Corp., Westwood Trust, Westwood Advisors, LLC, Broadmark Asset Management, LLC, Salient Advisors, LP, and Salient Capital, LP.

**Non-Affiliates:** Companies not related by common ownership or control. They can be financial and non-financial companies. Westwood only shares information with non-affiliates with your consent or for our or our affiliates' everyday business purposes.

**Joint Marketing:** A formal agreement between non-affiliated financial companies that together market financial products or services to you. Westwood Trust and Westwood Advisors, LLC enter into joint marketing agreements with unaffiliated financial companies, but these agreements prohibit disclosure of your nonpublic personal information except as may be permitted by applicable law.



## Other Important Information

**Westwood Trust Department of Banking Disclaimer:** Westwood Trust is chartered under the laws of the State of Texas and by state law is subject to regulatory oversight by the Texas Department of Banking. Any consumer wishing to file a complaint against Westwood Trust should contact the Texas Department of Banking through one of the means indicated below:

- In person or U.S. Mail: 2601 North Lamar Boulevard, Suite 300, Austin, TX 78705-4294
- Fax Number: 512.475.1313
- E-mail: [consumer.complaints@banking.state.tx.us](mailto:consumer.complaints@banking.state.tx.us)
- Website: [www.banking.state.tx.us](http://www.banking.state.tx.us)



## Privacy Notice Supplement

### Because Your Trust Is So Important

This PRIVACY NOTICE supplements the information contained in the Privacy Statement of Westwood Holdings Group, Inc. (“WHG”) and its subsidiaries. This Privacy Notice describes the processing of Personal Information that is provided, collected, or shared in connection with our relationship with you, including through this website (“Site”). Your trust is the cornerstone of our relationship. That is why we work so diligently to safeguard your privacy. The information that you provide us is kept in the strictest of confidence. We have no intentions of selling personal information about our clients to third-party businesses. We are proud to make that commitment to you, because your trust is the foundation of our business.

Additionally, this notice is intended to comply with the **California Consumer Privacy Act of 2018 (“CCPA”)**, other California privacy laws, and the laws of various states with substantially similar pending or passed legislation. The CCPA was enacted to protect the personal information of California residents. Any terms defined in the CCPA have the same meaning when used in this notice.

All business lines and all employees are expected to adhere to our policies regarding information security. In addition to our Privacy Notice, the following provides further detail on how we use and protect our clients’ information. We ask that you read it carefully.

**Westwood, we, our, and us**, when used in this supplement, shall mean Westwood Holdings Group, Inc., Westwood Management Corp., Westwood Trust, Westwood Advisors, LLC.

**You and your**, when used in this supplement, shall mean all current and former Westwood clients, prospects, and consumers who have shared personal information with Westwood.

We do not respond to **Do Not Track (“DNT”)** signals sent to us by your browser at this time. To learn more about how DNT works, please visit <http://allaboutdnt.com/>.

### The Information We Collect

We collect personal information in connection with providing a financial product or service to you. To help the government fight the funding of terrorism and money laundering activities, federal law requires all financial institutions to obtain, verify, and record information that identifies each person who opens an account. Therefore, when you open an account, we collect information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household (“personal information”). In particular, if indicated with a “yes” below, we have collected the categories of personal information from consumers within the last twelve (12) months:



Category	Categories of Third Parties to Which We Disclose Personal Information for a Business or Commercial Purpose	Categories of Third Parties to Which We May Sell or Share Personal Information	Retention Period
<p>Identifiers.</p> <p>A real name, alias, postal address, unique personal identifiers, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.</p>	<p>Affiliates and third-party vendors</p>	<p>We do share this category of personal information. We do not sell this category of Personal information.</p>	
<p>Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80([e])).</p> <p>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.</p>	<p>Affiliates and third-party vendors</p>	<p>We do share this category of personal information. We do not sell this category of Personal Information.</p>	
<p>Protected classification characteristics under California or federal law.</p> <p>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</p>	<p>Affiliates and third-party vendors</p>	<p>We do not sell or share this category of Personal Information.</p>	





Category	Categories of Third Parties to Which We Disclose Personal Information for a Business or Commercial Purpose	Categories of Third Parties to Which We May Sell or Share Personal Information	Retention Period
childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).			
Commercial information.	Affiliates and third-party vendors	We do not sell or share this category of Personal Information.	
Professional or employment related information.  Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	Affiliates and third-party vendors	We do not sell or share this category of Personal Information.	

We retain Personal Information for as long as we reasonably require it for business and legal purposes. In determining data retention periods, WHG considers contractual and legal obligations, and the expectations and requirements of customers, vendors, suppliers and others who share their Personal Information with us. When we no longer need Personal Information, we securely delete or destroy it.



## Personal information does not include:

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

## Use of Personal Information

The reasons that we can share your personal information are set out in the Privacy Notice above. In addition, we may use or disclose the personal information we collect for one or more of the following business purposes:

- To fulfill or meet the reason for which the information is provided. For example, if you provide us with personal information in order for us to determine risk tolerance, we will use that information to determine risk tolerance and an appropriate investment strategy.
- To improve our website performance and how its contents are presented to you.
- For analyzing current products and services and for product 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 collect for materially different, unrelated, or incompatible purposes without providing you notice.

## How we Collect Personal Information

We collect your Personal Information in a variety of ways:

- **We May Collect Your Personal Information Directly From You.** For example, if you request information from us. .



- **We May Also Collect Personal Information From Third Parties.** For example, we may work with business partners, advertising networks, analytics providers, and search information providers, who may provide us with Personal Information about you.

## Protecting Personal Information

**Destruction of Sensitive Data.** All records and data are properly shredded prior to disposal. Destruction of documents is handled by authorized employees and/or bonded companies when the shredding of large quantities of documents is required.

**The Confidentiality, Security, and Integrity of Your Information.** At Westwood, we restrict access to information about you to those employees who need to know that information in order to provide products and services to you. We maintain physical, electronic, and procedural safeguards to protect this information. We also understand that clients play a critical role in the protection of online accounts from protecting passwords to keeping your computer updated and patched. We share occasional insights on our cybersecurity site that may be of interest in this regard.

## Social Media

Westwood and select Westwood employees maintain profiles and/or pages on various social media platforms, including Twitter, Facebook, YouTube, Google+, Google My Business and LinkedIn (such social media platforms and any similar social media platforms added in the future are referred to hereinafter as the “platforms”). If you choose to “Follow” Westwood on any platforms or take any similar action on another similar platform, you are providing your consent to receive informational updates, including solicitations, from Westwood. To stop receiving this information from Westwood on a platform, you must follow the procedure established by the platform. For example, on Twitter, you must click “Unfollow” on Westwood’s profile page.

## Retention of Personal Information

We will retain your Personal Information for as long as necessary to fulfill the purposes for which it has been collected, as outlined in this Privacy Notice, or any longer retention period required by law. If you are a California resident, please see the section below titled Notice to California Residents for additional information about how long we retain your Personal Information.

## International Use of the Site

The Site is hosted in the United States. If you are visiting this Site from outside of the United States, please note that by providing your Personal Information it is being transferred to, stored, collected, or processed in the United States, where our data center and servers are located and operated



## Links to Third-Party Websites

We are not responsible for the practices employed by any websites or services linked to or from the Site, including the information or content contained within them. We encourage you to investigate and ask questions before disclosing Personal Information to third parties, since any Personal Information disclosed will be subject to the applicable third party's Privacy Notice.

## Children

Our Site is not directed at children under the age of 16. We do not knowingly collect Personal Information from children under 16. I

## Data Subject Rights

Depending on your state of residency, you may have one or more of the following rights with respect to your personal information:

- **Notice:** You may have the right to be notified of what categories of Personal Information will be collected at or before the point of collection and the purposes for which they will be used and shared.
- **Access:** You may have the right to know what Personal Information we have collected about you and to access such data.
- **Data Portability:** You may have the right to receive a copy of your Personal Information in a portable and readily usable format.
- **Deletion:** You may have the right to delete your Personal Information that we have obtained, subject to certain exceptions.
- **Correction:** You may have the right to correct inaccuracies in your Personal Information.
- **Opt out of certain processing:** You may have the right to opt out of the processing of your Personal Information for purposes of (i) targeted advertising, (ii) the selling or sharing of your Personal Information; or (iii) profiling in furtherance of decisions that produce legal or similarly significant effect concerning you.
- **Limit Use of Sensitive Personal Information:** You may have the right to limit certain uses of Sensitive Personal Information.

To exercise any of these rights available to you, please submit your request through via the options described in the “Exercising Your Rights and Choices” section below. If you are not satisfied with the resolution of your request and you are afforded a right to appeal such decision, you will be notified of our appeal process in our response to your request.

To opt out of marketing emails, you can use the unsubscribe link found in the email communication you receive from us. You may also use the “Contact Us” option within the relevant service to opt out and elect not to receive further emails from us. Please note that, even if you unsubscribe from certain correspondence, we may still need to contact you with important transactional or administrative information, as permitted by law.



Additionally, if you withdraw your consent or object to processing, or if you choose not to provide certain Personal Information, we may be unable to provide some or all of our services to you.



## Exercising Your Rights and Choices

To exercise the access and deletion rights described above, please submit a verifiable consumer request to us by either:

- Calling us at 214.756.6900
- Visiting [www.westwoodgroup.com](http://www.westwoodgroup.com)

### Verification

Only the Consumer or a person legally authorized to act on the Consumer's behalf may make a verifiable consumer request related to personal information. A Consumer may also make a verifiable consumer request on behalf of a minor child.

A Consumer may only make a verifiable consumer request for access twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify the Consumer is the person about whom we collected personal information or an authorized representative.
- Describe the Consumer's request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to a Consumer's request or provide the Consumer with personal information if we cannot verify the Consumer's identity or authority to make the request and confirm the personal information relates to such Consumer. Making a verifiable consumer request does not require a Consumer to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

The Consumer will be notified if we are unable to verify their identity or authority to make the request.

We will not discriminate against a Consumer for exercising any CCPA rights. Unless permitted by the CCPA, we will not:

- Deny the Consumer goods or services.
- Charge the Consumer different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide the Consumer a different level of quality of goods or services.
- Suggest that the Consumer may receive a different price or rate for goods or services or a different level or quality of goods or services.



## Response Timing and Format

We endeavor to respond to requests within the time period required by applicable law. If we require more time, we will inform you of the reason and extension period in writing. We do not charge a fee to process or respond to a Consumer's verifiable consumer request unless it is excessive, repetitive, or unfounded. If we determine that the request warrants a fee, we will tell the Consumer why we made that decision and provide a cost estimate before completing the request.

## California Shine the Light Law

Under California Civil Code Section 1798.83, individual customers who reside in California and who have an existing business relationship with us may request information about our disclosure of certain categories of personal information to third parties for the third parties' direct marketing purposes, if any. To make such a request, please contact us using the information in the Contact Us section below. Please be aware that not all information sharing is covered by these California privacy rights requirements and only information on covered sharing will be included in our response. This request may be made no more than once per calendar year.

## 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 provide notice through email or a posting on our website ([www.westwoodgroup.com](http://www.westwoodgroup.com))

## Contact Us

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 the CCPA, please contact us at:

**Phone:** 214.756.6900

**Website:** [www.westwoodgroup.com](http://www.westwoodgroup.com)