



Fairway America, LLC

Privacy Policy

**Appendix 6 to Fairway America Investment Advisors, LLC
Policies and Procedures Manual**

1. Introduction

As we develop our relationship with investors, it is important that we collect and share personal client information with Affiliates and key service providers in order to manage your accounts. Protecting your privacy is important to us and we want you to know how we treat your nonpublic personal information.

This document explains the Privacy Policy¹ of Fairway America, LLC, and each of its key service providers and related and affiliated entities other than Verivest LLC (collectively “Fairway America” or “Fairway”) concerning the privacy interests of our investors. The key service providers referenced herein are North Capital Private Securities (“NCPS”) and Forge Trust Company (formerly IRA Services). For information about Verivest’s Privacy Policy, please visit www.verivest.com/privacy. Fairway’s Affiliate, Fairway America Investment Advisors, LLC (“FAIA”) is an investment adviser registered with the SEC. FAIA’s principal business is to act as an investment adviser to Fairway’s private real estate funds. Investors in Fairway’s funds and other real estate offerings (collectively, our “Offerings”) are required to provide personal information in order to set up their accounts and enable Fairway America to manage each Offering’s assets.

The policy of Fairway America is to protect the confidentiality, integrity, and security of any nonpublic personal information of its investors and prospective investors, and to prevent unauthorized access to, or the use or disclosure of such information. As we accept new investors who complete subscription agreements, we collect nonpublic personal information for purposes of conducting our business. Any and all such nonpublic personal information is hereinafter referred to as “nonpublic personal information.” For convenience, “you” or “your” refers to any and all investor(s) described above and “we,” “our,” and “us” refers to Fairway throughout this document.

2. Our Commitment to You

We are committed to safeguarding the use of your nonpublic personal information. We protect the security and confidentiality of the nonpublic personal information we have collected, and make efforts to ensure that such information is used for proper business purposes in connection with the management or servicing of your account and our Offerings. Our relationship with you is our most important asset. We understand that you have entrusted us with your nonpublic personal information, and we do everything we can to maintain that trust.

Importantly, we do not sell your nonpublic personal information to anyone. We only provide such information to others in connection with the servicing and management of your account, managing our Offerings, analyzing investor demographics in an effort to execute more effective marketing activities, and operating Fairway’s business.

3. Definitions

“Affiliates”

Companies related by common ownership or control. They can be financial and non-financial companies. We only share your nonpublic personal information with Affiliates in connection with the operation of our business, the servicing and management of your account, and managing our Offerings. For example, our administrator and technology solutions provider, Verivest LLC, is our Affiliate and provides administration and technology services, including processing investor subscriptions and redemptions.

¹ As required by Title V of the Gramm-Leach-Bliley Act and United States Securities and Exchange Commission (“SEC”) Regulation S-P (17 CFR 248.1 – 248.30)

“Non-Affiliates”

Companies not related by common ownership or control. They can be financial and non-financial companies. We only share your nonpublic personal information with non-Affiliate service providers as described in this Policy.

“Key Service Providers”

Non-affiliate companies that provide critical administrative and financial services to Fairway. The key service providers referenced herein are NCPS and Forge Trust Company.

“Joint Marketing”

A formal agreement between non-affiliated financial companies that together market financial products or services to you. We do not engage in joint marketing.

4. Nonpublic Personal Information Collected

Fairway America and its Affiliates collect (or may collect) the following types of nonpublic personal information in order to conduct their businesses and manage the Fairway Offerings:

1. Information you provide in connection with a subscription in one of the Fairway Offerings, including your name, address, email address, telephone number, other contact information, social security number, tax ID number, assets, income, investment objectives, financial situation and debt. This information is obtained (or may be obtained) in writing, in person, by telephone, electronically or by any other means;
2. Information our Affiliates obtain (or may obtain) for the purpose of tax reporting to you and to the various agencies to which we report as required by law, including disclosures on various Internal Revenue Service (“IRS”) forms;
3. Information that relates to your account balance, capital contributions, redemptions and distributions, and any other transactions concerning which we provide investment advisory services or investment management services;
4. Information from non-Affiliates pursuant to law, rules, regulations, standard securities industry practice and/or legal process, including information and/or documents received, shared, produced or provided in connection with a subpoena, discovery request, or other legal process compelling production; and
5. Information from non-Affiliates related to servicing your account for purposes of providing investment management services.

5. Nonpublic Personal Information Disclosed to Affiliates and Non-affiliated Third Parties

We disclose to Affiliates and non-Affiliates nonpublic personal information in connection with us providing investment management services, conducting our investment advisory business, and analyzing our investor demographics in an effort to execute more effective marketing activities. Such disclosures include, among other things, information related to transactions, settlement, billing, communications, contact information, net worth, investment activities, payment, processing, clearing, transferring, reconciling, collection, and tax reporting. Such disclosures may be provided to Affiliates and non-Affiliates as required or necessary to carry out fully and properly our business, such as:

1. Disclosures to Affiliates and non-Affiliate service providers who supply us with computer related services including data maintenance and document processing and delivery;
2. Processing services, and disclosures to Affiliates and non-Affiliates, such as custodians, administrators, accountants, auditors, legal firms, etc.;
3. Broker dealer services through NCPS;
4. As required by law or legal process;
5. Analyzing profiles of investor demographics in an effort to execute more effective marketing activities;
6. With your consent, including consents provided through acceptance of online terms of use and privacy policies of our various Affiliates;
7. For purposes of making you aware of future investment opportunities available through our Affiliates.

6. Former Investors

Except as required to continue the management of our Offerings or to comply with regulatory books and records and other requirements, we will disclose nonpublic personal information about former investors in our Offerings only for the purpose of analyzing investor demographics or as permitted or required by law or legal process, or with the former investor's consent.

7. When You Can Limit Sharing

Federal law gives you the right to limit the sharing of your nonpublic personal information, when: (1) sharing is for Affiliates' everyday business purposes, (2) sharing with Affiliates is done to use your information to market to you, and (3) sharing with non-Affiliates is done to use your information to market to you. We do not share your information in any of these ways, except for purposes of making you aware of future investment opportunities available through our Affiliates and, to the extent an affiliated service provider requires such information, to manage your account and investment in our Offerings. We may also share your nonpublic personal information with non-Affiliates to improve our profile of investor demographics and similar activities. State laws and individual companies may give you additional rights to limit sharing.

8. Confidentiality and Security of Nonpublic Personal Information

We are committed to implementing and maintaining commercially reasonable and appropriate measures to maintain your nonpublic personal information in a secure and confidential fashion. Our information security procedures include, but are not limited to, the following features:

1. Access controls on customer information systems, including controls to authenticate and permit access only to authorized individuals, and controls to prevent our employees from providing nonpublic personal information to unauthorized individuals;
2. Physical access restrictions at locations such as buildings, computer facilities, and record storage facilities, in order to restrict access of nonpublic personal information to unauthorized individuals;
3. Segregation of duties for our employees with responsibilities necessitating access to nonpublic personal information;

4. Response programs that specify actions to be taken when we suspect or detect that unauthorized individuals may have gained access to nonpublic personal information; and

A disaster recovery plan to protect against loss or damage to nonpublic personal information due to potential hazards, such as fire and water damage or technological interruption or failure.

9. Maintenance of Records

Nonpublic personal information about you will be maintained during the time you are an investor, and for the time thereafter that such records are required to be maintained by federal and state securities laws.

10. Notice to Investors

We will send you notice of our Privacy Policy upon executing a subscription agreement, and annually if there are any changes to our policy, for as long as you are an investor. Periodically we may revise our Privacy Policy, and will provide you with a revised policy if the changes materially alter the previous Privacy Policy.

11. Opting Out

Section 502(a) of the Gramm-Leach-Bliley Act generally prohibits a financial institution, directly or through its Affiliates, from sharing nonpublic personal information with a non-Affiliate unless the institution (i) provides the consumer with a notice of the institution's privacy policies and practices, (ii) provides the consumer with a clear and conspicuous notice that the consumer's nonpublic personal information may be disclosed to non-Affiliates, (iii) gives the consumer an opportunity to opt out of that disclosure, and (iv) informs the consumer how to opt out.

Investors can opt out of allowing Fairway to share nonpublic personal information with non-Affiliated third parties for purposes of better understanding Fairway's investor demographic profile and similar purposes by emailing ir@fairwayamerica.com. Because the sharing is necessary to managing your investments with Fairway, investors cannot opt out of allowing Fairway America to share their nonpublic personal information with NCPS, Forge Trust Company, or other Key Service Providers whose services are necessary to the servicing of an investor in one of Fairway's offerings.

12. Requests for Information

Anyone may request a copy of the current version of our Privacy Policy or procedures by contacting our Chief Compliance Officer, Michael Holman, either by email at mike.holman@fairwayamerica.com or in writing at:

16150 SW Upper Boones Ferry Road
Portland, OR 97224
503.906.9100

FAIRWAY AMERICA, LLC

PRIVACY NOTICE

Fairway America, LLC and each of its related and affiliated entities other than Verivest LLC, including Fairway America Investment Advisors, LLC (collectively “Fairway America,” “us,” or “we”) has adopted its Privacy Policy with recognition that protecting the privacy and security of the nonpublic personal information we obtain about our investors (“you”) is an important responsibility. We also know that you expect us to service you in an accurate and efficient manner. To do so, we must collect and maintain certain nonpublic personal information about you. We want you to know what information we collect and how we use and safeguard that information.

WHAT INFORMATION WE COLLECT

We collect certain nonpublic personal information about you (such as your name, address, social security number, contact information, etc.) that you provide on subscription agreements, custodian or brokerage applications, or other forms as well as communications (electronic, telephone, written or in person) with you or your authorized representatives (such as your attorney, accountant, etc.), including through our affiliates. We also collect information about your accounts with us to manage our private funds and other offerings.

WHAT INFORMATION WE DISCLOSE

Fairway America does not disclose the nonpublic personal information we collect about our investors to anyone except: (1) in furtherance of our business relationship with investors, and then only to those persons necessary to effect the transactions and provide the services that investors authorize (this includes key service providers such as broker-dealers, administrators, technology providers, custodians, independent managers, etc.) and to affiliates for purposes of making you aware of future investment opportunities available through our affiliates; (2) with non-Affiliates to analyze investor demographics in an effort to better understand our investor demographic profile and better execute more effective marketing activities. (3) to persons assessing our compliance with industry standards (e.g., professional licensing authorities, etc.); (4) our attorneys, accountants, and auditors; or (5) as otherwise provided by law.

We are permitted by law to disclose the nonpublic personal information about you to governmental agencies and other third parties in certain circumstances (such as third parties that perform administrative services on our behalf). These third parties are prohibited to use or share the information for any other purpose. If you decide to either terminate our services or become an inactive client, we will continue to adhere to our Privacy Policy, as may be amended from time to time.

SECURITY OF YOUR INFORMATION

We restrict access to your nonpublic personal information to those employees who need to know that information to service your account. We maintain physical, electronic and procedural safeguards that comply with applicable federal or state standards to protect your nonpublic personal information.

CHANGES TO OUR PRIVACY POLICY OR RELATIONSHIP WITH YOU

Our policy about obtaining and disclosing information may change from time to time. We will provide you notice of any material changes to the policy.

OPTING OUT

Investors cannot opt out of allowing Fairway America to share their nonpublic personal information with affiliated or non-affiliated third parties who are necessary to service their accounts, including Key Service

Providers. Investors may opt out of us sharing information with affiliates for purposes of making you aware of future investment opportunities available through those affiliates. Investors may also opt out of sharing with non-Affiliates for purposes of analyzing investor demographics by emailing ir@fairwayamerica.com. You may do so by contacting CCO Michael Holman via email at mike.holman@fairwayamerica.com.

REQUESTS FOR INFORMATION

For a copy of our current Privacy Policy, please contact the CCO Michael Holman at mike.holman@fairwayamerica.com.