

## Privacy Policy

Last Updated on December 20, 2018

PLEASE READ THIS PRIVACY POLICY CAREFULLY. BY ACCESSING AND USING THIS WEBSITE, YOU AGREE TO BE BOUND BY THIS PRIVACY POLICY IN ITS ENTIRETY. IF YOU DO NOT AGREE WITH THE TERMS OF THIS PRIVACY POLICY, PLEASE DO NOT USE OUR WEBSITE.

The website (CrowdCapitalPartners.com (“Website”)) together with the documents referred to on it is owned and operated by Crowd Capital (“we”, “us”, “our”, “Crowd Capital”). This Privacy Policy provides information about our policies and procedures regarding the collection, use, and disclosure of personal information received through the Website from visitors and registered users of the Website (the “Privacy Policy”). This Privacy Policy is incorporated into, and is part of, our [Terms of Use](#) which govern your access to the Website and/or your use of the Website and of the Content (as defined in the [Terms of Use](#)) and the Products and Services made available on or through the Website (collectively, the “Products & Services”). Unless otherwise defined herein, capitalized terms shall have the meaning assigned to such terms in the [Terms of Use](#). If you have comments, suggestions, questions, or concerns about our Privacy Policy, please contact us at [info@CrowdCapitalPartners.com](mailto:info@CrowdCapitalPartners.com).

### WHAT INFORMATION IS COLLECTED ON THE WEBSITE

A. Information You Provide To Us. When you visit our Website, we may collect your e-mail address if you provide it to us voluntarily in order to contact you about our Products & Services. While some items are optional, most are required for legal and security purposes. To sign up as a registered user of our Website (“Registered User”) and access the Registered User Area (as defined in the [Terms of Use](#)), you have to create a user account and provide the following personal information to us during the registration process: your name, your e-mail address, your phone number, and your country of residence. You may also provide to us voluntarily information about your investment profile, such as, income level, net worth, investment experience, desired investment term. If you contact us by email, we may keep a record of your contact information and correspondence, and may use your email address, and any information that you provide to us in your message, to respond to you. If you choose to use our referral service to invite a friend to the Platform, we will ask you for that person’s email address or import your existing contacts, and automatically send an email invitation. Crowd Capital stores this information to send this email, to register your friend if your invitation is accepted and to track the success of our invitation service.

- i) Financial Data. Registered Users who use our Website to make an investment in our offerings will be asked to provide certain financial data, such as your bank account number and bank routing number. This information is required to enable us or our payment processor and our banking partners to utilize your bank account to originate funds transfers and make subsequent investment disbursements to you. Because our payment processor will perform services related to the offering, transaction and processing of payments, your personal information will be shared with them and will be subject to their Privacy Policy.

B. Information We Collect About Your Interaction with the Website. We collect additional information about your interaction with the Website without identifying you as an individual (“Anonymous Information”), by using cookies on our Website. For example, we receive certain standard information that your browser sends to every website you visit, such as your IP address, browser type and language, access times and referring website addresses. We may use Anonymous Information for any purpose in our discretion. For clarity, Anonymous Information means information that is not associated with or linked to your personal information and does not permit the identification of individual persons.

## HOW INFORMATION COLLECTED ON THE WEBSITE IS USED AND SHARED

A. How We May Use Your Information. We may use the information we collect from and about you on the Website (collectively, “Information”) for any of the following purposes: (i) to operate the Website and provide the Services; (ii) to respond to your requests and inquiries; (iii) to contact you and to communicate with you about your use of the Services and your Registered User account; (iv) to notify you about important changes to our Services, such as updates or revisions to this Privacy Policy or our [Terms of Use](#), security announcements or other similar messages; (v) to review Website usage and operations and to improve the content and functionality of the Website and our Services; (vi) to provide you with information and materials about our products and services; (vii) to address problems with the Services; (viii) to protect the security or integrity of our Services, our Registered Users and our business, (ix) to communicate with you regarding any investments which you have made in products offered on the Website; and/or (x) to tailor the Website to our clients’ needs.

B. How We May Share Your Information. We will not sell or lease your Information to any third party. Except as otherwise expressly provided in this Privacy Policy, Crowd Capital will only share your Information: (i) as required by law or regulation or as we believe in good faith that disclosure of such personal information is reasonably necessary to: (1) satisfy any applicable law or regulation, (2) to respond to claims and/or to comply with a judicial proceeding, court order, or legal process served on us, (3) to protect and defend our rights or property, and/or the rights or property of our Registered Users, or third parties, as permitted by law, (4) to detect, prevent, or otherwise address fraud, security or technical issues; or (5) to enforce our [Terms of Use](#); (ii) with our payment processor as is necessary for them to conduct certain compliance services related to “Know Your Customer” regulations and anti-money laundering and sanctions laws (your personal information will be subject to their Privacy Policy) and/or (iii) with our service providers that provide certain services to maintain and operate the Services and certain features on the Services and to conduct certain compliance services related to “Know Your Customer” and compliance with anti-money laundering and sanctions laws (e.g. we may use third parties to host the Website or operate various features available on the Website, sending and managing email, analyzing data, and providing search results) and those service providers will be permitted to obtain only the Information they need to deliver the service. As with any other business, it is possible that in the future we could merge with or be acquired by another company. If such an acquisition occurs, the successor company would have access to the Information, but would continue to be bound by this Privacy Policy unless and until it is amended.

## ACCESSING, CHANGING OR REMOVING PERSONAL INFORMATION

If you are a Registered User, we urge you to review your personal information regularly to ensure that it is correct and complete. We provide an easy way via your online account profile for you to access, correct, update or remove personal information that has previously been provided to us. You can review your personal information and make any necessary changes at any time, by logging in to your Registered User account. If you are unable to edit your personal information by logging into your Registered User account, please contact us for assistance at [support@CrowdCapitalPartners.com](mailto:support@CrowdCapitalPartners.com).

## OPTING OUT

We may also use your contact information to send you marketing and promotional messages. If you do not want to receive such messages, you may opt out by following the instructions in the message. Please understand that if you choose not to receive promotional correspondence from us, we may still contact you in connection with your relationship, activities, transactions and communications with us. If you need assistance opting out, please contact us at [support@crowdcapitalpartners.com](mailto:support@crowdcapitalpartners.com).

## SECURITY OF YOUR PERSONAL INFORMATION

We have implemented reasonable technical and organizational measures designed to deter unauthorized access to and use, destruction of, modification of, or disclosure of personally identifiable information we collect via the Website. Regardless of the precautions taken by us or by you, no data transmitted over the Internet or any other public network can be guaranteed to be 100% secure. We cannot ensure or warrant the security of any information you transmit to us and you provide all personally identifiable information via the Website at your own risk. You are responsible for maintaining the security of your Registered User profile information, including your password and for any and all activities that occur under your account. Do not share this information with anyone. We will never ask you to send your password or other sensitive information to us in an email, though we may ask you to enter this type of information on the Website. If you are sharing a computer with anyone you should always log out before leaving the Website to protect access to your personally identifiable information from subsequent users.

## NOTICE TO USERS IN THE EVENT OF A SECURITY BREACH

If a Registered User's personal information is compromised as the result of a breach of security, we will use commercially reasonable efforts to attempt to notify affected Users directly, or via the Website, of the breach if we determine that the information is sensitive, in accordance with this Privacy Policy and the Terms of Use, or as otherwise required by applicable law.

## COOKIES AND LOG DATA

A. Tracking Technologies. Unique identifiers such as cookies (which are small text files stored locally on your computer that help store user preferences and may be html files, Flash files, or other technology), web beacons or clear gifs (which are small pieces of code placed on websites used to collect advertising metrics, such as counting page views, promotion views, or advertising responses, tags and scripts or similar technologies (collectively referred to as "Tracking Technologies") are used by Crowd Capital and our marketing, analytics, or other service providers to understand Website usage, help customize our content, offerings or advertisements on the Website, personalize your experience on the Website (e.g., to recognize you by name when you return to the Website, save your password in password-protected areas, or save your online settings), analyze trends, allow users to move between associated websites without logging into each Website, and other purposes related to our management and administration of the Website. In many Internet browsers, you can choose to delete, disable, turn off or reject most Tracking Technologies through the "Internet Options" sub-option of the "Tools" menu option of your browser or otherwise as directed by your browser's support feature. Additional information on deleting, disabling, rejecting or turning off Tracking Technologies may be available through your browser's support feature. Please consult the "Help" section of your browser for more information. Please know that certain areas and features of our Website can only be accessed in conjunction with cookies or similar devices and you should be aware that disabling cookies or similar devices might prevent you from accessing some of our content. We do not currently respond to "do not track" signals or other mechanisms that might enable users to opt out of tracking on our Website.

B. Log Files. Log data collected on web servers supplies us with aggregate information about the number of visits to different pages on our Website. We use such aggregate information to improve access to our content based on our visitors' browsers and operating system types to make our content available to as many users as possible. We do not link the "log data" collected to personally identifiable information submitted by users when participating in our activities. This Privacy Policy covers the use of cookies by Crowd Capital and does not cover the use of cookies by any advertisers. Some of our third-party providers (e.g., third-party advertisers) may use cookies on our Website. We have no access to or control over these cookies.

C. BY USING THE PLATFORM, YOU ARE AGREEING TO THIS PRIVACY POLICY AND CONSENTING TO THE USE OF TRACKING TECHNOLOGIES AS SET FORTH IN THIS PRIVACY POLICY.

## LINKS TO OTHER SITES

Our Website may contain links to other websites. The fact that we link to a website is not an endorsement, authorization or representation of our affiliation with that third party. We do not exercise control over third party websites. These other websites may place their own cookies or other files on your computer, collect data or solicit personal information from you. Other sites follow different rules regarding the use or disclosure of the personal information you submit to them. We encourage you to read the privacy policies or statements of the other websites you visit. Please be aware that the terms of our Privacy Policy does not apply to these third party websites.

## CHILDREN'S PRIVACY

This Website is not intended for, or designed to attract, children under the age of 16 and as such, we do not intentionally gather information from individuals who are under the age of 16. Upon notification that a child under 16 has provided us with personally identifiable information, we will delete the child's personally identifiable information from our records.

## PRIVACY RIGHTS OF CALIFORNIA RESIDENTS

Under California law, we must provide California residents with a summary of their privacy rights. California law requires us to inform you, at your request, (a) the categories of personal information we collect and the third parties we share that information with; (b) the names and addresses of such third parties; and (c) examples of the products marketed by such companies. Additionally, the Act requires us to allow you to control who you do not want us to share that information with. To obtain this information, please send us your request by email at [Info@CrowdCapitalPartners.com](mailto:Info@CrowdCapitalPartners.com). When contacting us, please indicate your name, address, email address, and what personal information you do not want us to share. Your request should be labeled "California Customer Choice Notice," and 30 days should be allowed for a response. There is no charge for controlling how your personal information is shared.

## INTERNATIONAL VISITORS

Crowd Capital and its servers are located in the United States, our Privacy Policy has been prepared to comply with applicable United States law. If you are an international visitor, you should note that by providing your personal information on or through the Website, you are: (i) consenting to the transfer of your personal information from regions outside the United States to the United States which may not have the same data collection and protection laws as the country in which you reside; and (ii) consenting to the use of your personal information in accordance with this Privacy Policy.

## CHANGES TO THIS PRIVACY POLICY

We reserve the right at any time to make changes to this Privacy Policy simply by posting such changes or updates on the Website and without any other notice to you. If we do this, we will indicate at the top of the page the date the Privacy Policy was last updated. Any such changes or updates will be effective immediately upon posting on the Website. Each time you use the Website, the current version of this Privacy Policy will apply. You understand and agree that your continued use of the Website after we have made any such

changes constitutes your acceptance of the most current Privacy Policy, as amended. You can always refuse to accept the changes to our Privacy Policy by terminating your use of the Platform.

#### HOW TO CONTACT US

If you have any questions about our Privacy Policy, please contact us by e-mail at [info@CrowdCapitalPartners.com](mailto:info@CrowdCapitalPartners.com)