

# RAPASKI CAPITAL – PRIVACY POLICY

UPDATED APRIL 2020

## Your Privacy is Important to Us

Rapaski Capital Group LLC (“RapaskiCapital”, “We”, “Our”, or “Us”) values the privacy of the visitors to its website (“Website”) and the users of the services provided thereon (individually, “User” or “you”, and collectively, “Users”), and makes it a priority to protect any personally identifiable information it obtains from its Users. This Privacy Policy explains RapaskiCapital’s collection, use, and protection of your personal information on and in connection with the RapaskiCapital.com website (“Website”) and all content, services and/or products provided through the Website (collectively, the “Services”).

If you have any questions that this policy does not address, please CONTACT US (LINK) By accessing the Services, registering as a user, using our Service or by otherwise submitting your personal information to us, you give your consent to the collection and use of personal information as explained in this policy. The term “personal information” refers to non-public information that personally relates to or identifies you (such as your name, password, age, gender, email address, postal mailing address, zip code, home/mobile telephone number, Social Security number and/or taxpayer identification number, investment objectives, investment experience, assets and income, website pages viewed and other similar information).

Non-personally identifiable information collected on the Website may include, without limitation, sites visited before visiting the Site, frequency of visits, clickstream data, browser type, operating system, organization name, articles, internet connection speed, presentations viewed, time spent viewing pages of our website or using certain features of our website, demographic data such as server locations, location services, cookies existing on your computer, search criteria and results, and other information which does not specifically identify you.

## How we limit collection & use of data

We are required by law and regulatory bodies to ask for certain information in order to provide our Services to you. RapaskiCapital makes commercially reasonable best efforts to maintain the confidentiality, integrity and security of our clients’ personal information.

Keeping client information secure, and using it only as our Users want us to, are matters of principle for all of us at RapaskiCapital. With this in mind, here is our commitment to each and every User: Except as you may otherwise expressly approve, we will limit the collection and use of client and user information to what we believe would be useful to service your accounts, administer our business, or to tell you about our Services;

- We will restrict employee access to client and user information to those who need to know in order to provide Services to you;
- We will educate our employees according to our internal policies to reinforce the importance of confidentiality and client and user privacy;
- We will maintain commercially reasonable and customary security standards and procedures to protect information about you;

- and We will respond quickly to your request to correct inaccurate information.

### **Updates and Changes to Privacy Policy**

In the event of a change in this policy, a revised Privacy Policy will be posted to our Website, and the “Updated” date will be changed. If the revised Privacy Policy contains a material change to how we collect or use personal information, notice of the change will be emailed to you or posted on the Website’s home page.

Please revisit this page to familiarize yourself with changes to the Privacy Policy. You agree to accept posting of a revised Privacy Policy as described herein as actual notice to you of such revised Privacy Policy. Your continued use of the Services after such posting constitute to the collection and use of your information as described in the then-current Privacy Policy.

### **How and Why We Gather Information**

When you register for an account for the Services or at any later time, we collect certain personal information from you to open an account, transact business, communicate with you, verify your identity and fulfill legal and regulatory requirements. We call this your “Profile.” From time to time, we may request additional information (e.g., through surveys) to help us further assess your needs and preferences.

If you choose to provide such information, during registration or otherwise, you are giving RapaskiCapital the permission to use and store it consistent with this Privacy Policy. We may also obtain your personal information from your transactions with us or other Users through the Services, or from third parties such as credit reporting agencies. If we combine or associate information from other sources with personal information that you provide directly to us through or in connection with the Services, we will treat the combined information as personal information in accordance with this Privacy Policy. When you visit the Website, whether or not you register for an account, we may send one or more cookies.

“Cookies” are small text files containing a string of alphanumeric characters that may be placed on your web browser. Cookies make it easier for you to navigate our Website by, among other things, “remembering” your identity so that you do not have to input your password multiple times as you navigate between web pages on the Website and/or as you access the Services. This use of cookies for authentication (i.e., verifying that you are who you say you are) is an essential component of site security. You can set your web browser to inform you when cookies are set or to prevent cookies from being set. A “web beacon” is typically a transparent graphic image (usually 1 pixel x 1 pixel) that is placed on a site or in an email which allows the website to record the simple actions of the user opening the page that contains the beacon.

“Server logs” can be either a single log file or several log files automatically created and maintained by a server of activity performed by the server, which can include information about any transaction you conduct with the server.

Please note that if you decline to use cookies, you may experience reduced functionality or slower site response times. Declining to use our authentication-related cookies may prevent you from using the Website altogether.

We or our service providers may also collect web surfing data related to your use of the Services (e.g., information regarding which of our web pages you access, the frequency of such access, and your product and service preferences). This may be accomplished by using cookies, web beacons, page tags or similar tools. Such web surfing data may include your Internet Protocol (IP) address, browser type, internet service provider (ISP), referring or exit pages, click stream data, operating system and the dates and times that you visit the Website. Web surfing data and similar information may be used for administrative purposes; to assess the usage, value and performance of our online products and services; and to improve your experience with the Services.

### **How Information Helps Both You and Us**

RapaskiCapital's mission is to provide you with exceptional investment opportunities to match your individual investment goals. Information about you and your accounts plays a key role in our ability to succeed in this mission. It also helps us service your accounts and administer our business. For example, we use information about you to:

- Provide you with the Services available through the Website;
- Best determine which products and services may be of most interest to you;
- Establish and set up your account, issue an account number, and maintain your transaction history;
- Respond more accurately and efficiently to your requests;
- Identify opportunities to give you more convenience and control by developing new services that may benefit you;
- Better market and advertise RapaskiCapital investment offerings and services;
- Verify your identity and contact information to help protect you and RapaskiCapital from fraud;
- Comply with certain legal and regulatory requirements.

We generally use the information that you provide or that we collect to establish and enhance our relationship with you, and to operate, maintain, enhance, and provide the Services and the Website. We may use such information to periodically provide you with information, newsletters or offers about features and services available through the Services that may be of interest to you.

We may also send information or offers to groups of Users on behalf of other Users or third parties. However, you will have the option to opt out of receiving such information. We use aggregated information provided by or collected from our Users to understand and analyze the usage trends and preferences of our Users, to improve the way the Services and the Website work and look, and to create new features and functionality.

We may use aggregated information about our Users' investments to generate statistics and maps that we deem helpful in the provision of the Services or any part thereof. We do not and will not sell analytics about our users without written consent from the user.

As you browse RapaskiCapital and other websites, online ad networks we work with may place anonymous cookies on your computer, and use similar technologies, in order to understand your interests based on your (anonymous) online activities, and thus to tailor more relevant ads to you.

### **Sharing Your Information with Others**

We may allow you to share certain information with other Users of the Services. You can share your profile with all other Users, or only with such other Users as are designated by you. You are not required to share your profile or any other information with other Users. If you do share your profile, anyone you designate will be able to see what companies you are following and investing in.

If you indicate an interest in making an investment through the Services, such as indicating an interest to buy equity or make a loan in a particular private real estate company, we will notify the party or parties offering the investment (the "Issuer") of your interest and may notify other Users with whom you have chosen to share information. By indicating an interest in an investment and/or sharing your Profile with other Users, you consent to this disclosure of your information. We may also collect and store information, which could include Non-Personally Identifiable Information or Personally Identifiable Information, locally on your computer or device using mechanisms such as browser web storage or application data caches.

### **Social Media Features**

You can log in to the Website using services such as LinkedIn or Google. These services will authenticate your identity and provide you the option to share certain personal information with us such as your name and email address to pre-populate our sign up form.

Our Website may also include social sharing features for common social networks. These features are interactive mini-programs and may collect your IP address and the page you are visiting on our site. They may set a cookie to enable the feature to function properly. Social media features and widgets are either hosted by a third party or hosted directly on our website. Your interactions with these features are governed by the privacy policy of the company providing them.

### **How and Why RapaskiCapital Discloses Your Information to Third Parties**

We limit the sharing of personal information outside RapaskiCapital. We do not sell, license, lease, or otherwise disclose your personal information to third parties, except as noted below:

We may disclose your personal information when such disclosure is legally required or appropriate

pursuant any court orders, subpoenas or any regulations, including responding to court orders and subpoenas, cooperating with government agencies, other regulatory bodies, and law enforcement officials, performing background checks, resolving disputes or performing risk-management functions.

To help us improve our services, we may engage third parties to help us to carry out certain internal functions such as information management, account processing, client services, or other data collection relevant to our business. Examples of the types of outside companies with which we may share information include non-financial companies that perform services for us, such as data processing, marketing assistance, and companies that perform reporting, tax documentation, custody, title or escrow services on our behalf. Use of any personal information we share with these third parties is limited to the performance of the task we request.

We will only transfer your personal information to trusted third parties who provide sufficient technical and organizational security measures and guarantees governing the use of your information. Where third parties process personal information on our behalf, they will be required to agree, by contractual means or otherwise, to process the personal information in accordance with the applicable law.

If you indicate an interest in making an investment through services, we will notify the Issuer of your interest and will provide your personal information to the Issuer to engage in any other lawful activities we believe are consistent with this Privacy Policy and the services. You may elect to share your user content (as that term is defined in the Terms of Service ) with other Users. Any personal information that you choose to include in, or that is associated with, your user content will be accessible by other Users. Once you make your personal information available to others in any of these ways, it may be collected and used by the recipients without restriction.

We may make certain automatically collected information about your interactions and activities on the Services, such as the business or investment areas of interest to you or that you have invested in, and your past activities, projects or proposals, publicly available on or through the Services. Any such publicly available information will be accessible by other Users.

### **Our Privacy Policy Does Not Apply to Third-Party Activities or Sites**

The Website may provide links to third-party websites for your convenience and information. If you access those links, you will leave the RapaskiCapital Website. Any information submitted by you to a third party, including Issuers, will be controlled by that third party's privacy policy, which may differ from RapaskiCapital's.

This Privacy Policy does not cover the collection of information by cookies or other methods by such third party services or other third parties, such as our business partners. We do not control how these third party services or third parties collect information or by what means such third party services or

third parties may use their own cookies to collect information about you. We do not endorse, screen, or approve, and are not responsible for the privacy practices or the content of, other websites or services. We encourage you to review the privacy policy of any company before submitting your personal information.

### **Keeping Information Safe**

We limit access to your personal information to those employees who have a legitimate business need to access such information to provide you with the Services. In keeping with industry standards and practices, we maintain commercially reasonable physical, electronic and procedural safeguards and controls to protect your information. The website is built upon a secure infrastructure with multiple layers of protection and we use industry standard encryption technologies to safeguard your information.

Users are required to identify and authenticate themselves prior to accessing restricted portions of the Services. As a reminder, our platform supports two-factor authentication to protect your login. Generally, identification and authentication take place through the use of your user name and a password. You are responsible for keeping your password confidential. We have security standards and procedures in place designed to prevent unauthorized access to your accounts and personal information. A key part of this process helps ensure that all information we have about you is accurate and up-to-date. If you ever discover inaccuracies in our data or if your personal information changes, notify us at [Investors@RapaskiCapital.com](mailto:Investors@RapaskiCapital.com).

The transmission of information via the Internet is not completely secure, and for this reason we cannot guarantee the security of information sent to us electronically. If we learn of a security systems breach, we may attempt to notify you electronically so that you can take appropriate protective steps. We may also post a notice on or through the Website and the Services in the event of a security breach. Depending on where you live, you may have a legal right to receive notice of a security breach in writing.

### **Reviewing, Changing or Correcting Information**

You are solely responsible for helping us to maintain the accuracy and completeness of your personal and other information. We urge you to review your information regularly to ensure that it is correct and complete. If you believe that any of your information is incorrect, or if you have any questions regarding this Privacy Policy, please contact us at [Investors@RapaskiCapital.com](mailto:Investors@RapaskiCapital.com). You may, of course, decline to share any or all of your personal information with us or ask us to delete your personal information from our systems at any time, in which case we may not be able to provide to you some of the features and functionality found on or through the website and the services.

### **An Ongoing Commitment to Your Privacy**

We are committed to protecting your privacy. If you choose to become inactive, you will continue to be protected by the policies and principles described in this Privacy Policy for as long as your personal

information is retained by us. Should you close your account with us, we will only retain your personal information for as long as necessary to comply with any applicable legal or regulatory requirements.