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## Privacy Policy

### Rosland Capital – Privacy Policy

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Welcome to the web site ("Web Site") operated by Rosland Capital LLC ("we" or "us"). We understand that you may be concerned about our collection, use, and disclosure of your information. Accordingly, we have implemented this Privacy Policy ("Policy") to describe the types of information that we collect, what we do with it, how we protect it, and when we disclose it to third parties. California residents should note that the Policy is also supplemented by and subject to the provisions set forth below under the section entitled "**Summary of Rights for California Residents Under California Civil Code (California Consumer Privacy Act).**"

#### **How Do You Agree To The Policy?**

This Policy is a part of and subject to the Terms of Service ("TOS"). Accordingly, when you enter into the TOS, you agree that you have read, understand, and agree that we can collect, use, and disclose your information in accordance with this Policy. If you do not agree or are not comfortable with any part of this Policy, you should not agree to the TOS (including this Policy) and you may not use the Web Site.

#### **How and When is the Policy Updated? How are You Notified of these Changes?**

We may, but are not obligated to, update this Policy from time to time. Accordingly, you should periodically check the Web Site for any changes. We reserve the right to amend this Policy at our discretion and at any time. When we make changes to this Policy, we will post the updated notice on the Web Site and update the Policy's effective date. **Your continued use of our Web Site following the posting of changes constitutes your acceptance of such changes.**

#### **What Categories of Information Are Collected Through The Web Site or Otherwise?**

- **Personal Information.** We collect information that can be used to identify you personally ("personal information"), such as your first and last name, mailing address, billing address, telephone number, email address, communication preference, and credit card (or other payment account) information.
- **Other Information.** We also collect information that cannot be used to easily identify you, such as information about your computer hardware and software.
- **Offline Collection, Use & Disclosure of Information.** We also collect some personal information offline and we protect the privacy of that personal information as well. When someone communicates with us offline, such as by telephone, we will ask for the personal information in order to place the order, answer questions

or otherwise respond to inquiries, and to establish a customer account. Customer order information may be stored in our customer database(s). Personal information may also be obtained by us through customer wire instructions, checks or correspondence or otherwise, and we will endeavor to treat offline collection, uses, and disclosures of customer personal information in the same manner as our online policies.

- You should know that we generally use personal information collected offline in a similar manner to how we use personal information which is collected online, as outlined above.

#### **How Do We Collect and Use This Information?**

- **Personal Information.** We collect the personal information that you voluntarily provide to us when you use the Web Site or contact us offline. For example, if you purchase a product from the Web Site or by calling us, we will collect any information that you provide to us in any such transaction. We use your personal information primarily for our own internal purposes, such as providing, maintaining, evaluating, and improving the Web Site, evaluating and fulfilling requests for purchases, and conducting follow-up marketing efforts.
- **Other Information.** Like the operators of most web sites, we may use tracking software and similar technology, which automatically collects information about your computer hardware and software, and use of the Web Site. This information may be used by us for the operation of the Web Site and to provide general statistics regarding use of the Web Site. Many commercial web site operators collect this information in similar ways.
- **Cookies.** Cookies are bits of electronic information that a web site can transfer to a visitor's hard drive to help tailor and keep records of his or her visit. Cookies allow web site operators to better customize visits to the site to the visitor's individual preferences. Many commercial web sites use cookies. Although most web browsers automatically accept cookies, you can usually change your browser to prevent or notify you whenever you are sent a cookie. This gives you the chance to decide whether or not to accept it. However, if you set your browser such that it does not accept cookies, you may not be able to access certain of the features on the Web Site.
- **Tracking Pixels or Beacons.** Aside from cookies, we also collect information regarding the delivery of an advertisement to a user's device through the use of "tracking pixels" or "beacons." A tracking pixel is a transparent graphic image, typically 1 pixel x 1 pixel, that is placed on a web page and, in combination with a cookie, enables the collection of information regarding the use of the web page that has the tracking pixel. We use tracking pixels to tell when an ad has been clicked on or otherwise interacted with, and use that information to determine which ads are more appealing to users. In some cases, we use third party service providers to help us collect and analyze this information.
- **Do Not Track Signals.** We do not respond to "do not track" signals from web browsers or other mechanisms that provide consumers the ability to exercise choice regarding the collection of personally identifiable information about an individual consumer's online activities over time and across third-party Web sites or online services.

### **How Do We Keep Your Personal Information Secure?**

We protect your personal information using appropriate security measures to protect against unauthorized access and/or disclosure. These measures include physical security designed to prevent unauthorized access to servers where personal data is stored, and ongoing internal reviews of our data collection, storage, and sharing practices as appropriate. In addition, we only maintain your credit card (or other payment account) information for as long as is necessary for us to process your payment.

- Access to your personal information is restricted to our employees, contractors and agents who need to access such information to provide our services.
- We make use of your personal information only for the purposes for which it was collected and in accordance with this Policy.

### **When Will We Disclose Your Personal Information Without Your Consent?**

Generally speaking, we will not disclose your personal information to third parties who are not our affiliates without your consent. (We will, however, share your personal information with our affiliates who may use it for marketing purposes.) We do not sell or exchange customer lists or customer information for marketing purposes with unaffiliated third parties. However, we reserve the right to disclose your personal information without your consent for any of the following reasons:

- **Disclosure to Successors.** We may disclose your personal information to any actual or potential successor-in-interest of ours, such as a company that is seeking to acquire us.
- **Third-Party Service Providers.** We may disclose your personal information to third party service providers who help us provide or maintain the Web Site. We require by contract that these third-party service providers implement and maintain reasonable practices to protect your personal information. We also may disclose your personal information to our suppliers to enable them to ship our products to you.
- **Other Disclosure.** We will disclose your personal information without your consent to prevent an emergency, to protect or enforce our rights, to protect against suspected credit card fraud, to protect or enforce the rights of a third party, or as required or permitted by law (including, without limitation, to comply with a subpoena or court order).

### **Can You Review and Change Your Personal Information?**

Please send us an email (at the email address listed below) if you would like to review or change your personal information. Once we have reasonable assurances that it is you, we will let you review or change your personal information.

### **How Do We Protect Your Personal Information?**

Whenever we obtain your personal information, we will implement and maintain reasonable practices to protect your personal information from unauthorized access or disclosure. While we will use such efforts, we cannot and will not act as insurers of the security of your personal information. Accordingly, we assume no liability for any

disclosure of data due to errors in transmission, unauthorized third-party access or other acts of third parties, or acts or omissions beyond our reasonable control.

### **What About Children’s Personal Information?**

We are not targeting the Web Site to children, and we do not knowingly collect personal information from children under the age of 18. If you are under the age of 18, please do not email us, contact us, attempt to access or use the Web Site, submit information, including personal information, to the Web Site, or ask us to email you. As a result of the foregoing age restrictions, no information obtained by the Web Site falls within the scope of the Children’s Online Privacy Protection Act of 1998, and information submitted to the Web Site is not monitored for such purposes.

### **What Can You Tell Us About California Privacy Rights?**

Section 1798.83 of the California Civil Code enables our customers who are California residents to request certain information from us with respect to our disclosure information to third parties for their direct marketing purposes. **California residents can make such a request by sending an email to us at: [compliance@roslandcapital.com](mailto:compliance@roslandcapital.com) or by writing to us at: Rosland Capital LLC, 11766 Wilshire Boulevard Suite 1200 Los Angeles, CA 90025 or by calling us at the following toll-free number: 1-800-967-5151.** Please also see the information set forth below under the caption **“Summary of Rights for California Residents Under California Civil Code (California Consumer Privacy Act).”**

### **Who Do You Contact If You Have Any Questions About Privacy?**

If you have any questions regarding privacy, you should contact us through the following email address: [compliance@roslandcapital.com](mailto:compliance@roslandcapital.com).

### **Summary of Rights for California Residents Under California Civil Code (California Consumer Privacy Act)**

If you are a California resident, this section applies to you. This section describes how we collect, use, and share your personal information in operating our business, and the rights that you have with respect to your personal information. More information regarding the: sources from which we collect personal information can be found as indicated above in **“What Categories of Information Are Collected Through The Web Site or Otherwise?”**; business and commercial purposes for which we collect your personal information can be found as indicated above in **“How Do We Collect and Use This Information?”**; and categories of recipients with whom personal information is shared can be found as indicated above in **“When Will We Disclose Your Personal Information Without Your Consent?”**

**California Civil Code (“CCP”) § 1798.100.** As a consumer, you have the right to request that we disclose the categories and specific pieces of personal information collected, which is sometimes referred to as a data portability request. At or before the point of collection, we must disclose to you the categories of information to be collected and the purposes for which the information will be used. This information must be disclosed to you free of charge, by mail or electronically. Information disclosed electronically must be in a portable format, and to the extent technically feasible, in a readily useable format that allows you to transmit the information without hindrance to another entity. “Personal information” is defined in CCP § 1798.140 to include 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 does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the California Consumer Privacy Act's scope, like:
- 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;
- 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.

**CCP § 1798.105.** As a consumer, you have the right to request that we delete the personal information collected from you. We are required to inform you of this right. We are not required to comply with a request to delete personal information if it is necessary for us or one of our service providers to maintain the information in order to accomplish one of the following:

- (1) Complete the transaction for which we collected the personal information, provide a good or 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.
- (2) Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- (3) Debug products to identify and repair errors that impair existing intended functionality.
- (4) Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- (5) Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 seq.).
- (6) Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
- (7) Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- (8) Comply with a legal obligation.
- (9) Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

**CCP § 1798.110.** You have the right to request that we disclose the following to you:

- (1) The categories of personal information we have collected about you.
- (2) The categories of sources from which the personal information is collected.
- (3) The business or commercial purpose for collecting or selling personal information.
- (4) The categories of third parties with whom we share personal information.
- (5) The specific pieces of personal information we have collected about you.

**CCP § 1798.115.** You have the right to request that we disclose the following to you:

- (1) The categories of personal information that we collected about you.
- (2) If we sold information about you—which we did not—the categories of personal information that we sold about you and the categories of third parties to whom the information was sold. If applicable, this information would be described by category of information for each third party to whom the information was sold.
- (3) The categories of personal information that we disclosed about you for a business purpose.

**CCP § 1798.120.** We do not and will not sell your personal information. If we did so, you would have the right to direct us not to sell your personal information and we would be required to give you notice of this right and to inform you that you could exercise this right by visiting a specific link on our Web Site that would be titled *“Do Not Sell My Personal Information”*.

**CCP § 1798.125.** We are prohibited from discriminating against you for exercising your rights under the California Consumer Privacy Act; this includes, but is not limited to, discrimination by:

- (1) Denying you goods or services.
- (2) Charging different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties.
- (3) Providing a different level or quality of goods or services to you.
- (4) Suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

However, we are allowed to offer financial incentives, including payments to consumers, for the collection, sale, or deletion of personal information. We are required to give you notice of any financial incentives offered and may only enter you into a financial incentive program if you provide consent by opting-in after being informed of the material terms of the program. You may revoke your consent at any time.

#### **Categories of Personal Information Collected in Past 12 Months**

We have collected the following categories of personal information from our customers within the last twelve (12) months:

<b>Category</b>	<b>Examples</b>	<b>Collected</b>
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	YES
B. Personal information	A name, signature, Social Security number, physical characteristics or description, address, telephone number,	YES

categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	<p>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.</p> <p>Some personal information included in this category may overlap with other categories.</p>	
C. Protected classification characteristics under California or federal law.	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 childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	NO
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	NO
E. Biometric information.	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 voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES, AS TO VISITORS TO OUR SITE
G. Geolocation data.	Physical location or movements.	NO, NOT USED, BUT POTENTIALLY ACCESSIBLE VIA IP ADDRESSES

H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	YES, AS TO AUDIO RECORDINGS
I. Professional or employment-related information.	Current or past job history or performance evaluations.	NO, AS TO CUSTOMERS.  YES, AS TO EMPLOYEES
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	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.	NO
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO

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

- Directly from you. For example, from forms you complete or products you purchase.
- Your actions on our Web Site, landing pages, and other web properties.

### **Use of Personal Information**

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

- As indicated above in “**How Do We Collect and Use This Information?**”
- To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to request a price quote or ask a question about our products, we will use that personal information to respond to your inquiry. If you provide your personal information to purchase

a product, we will use that information to process your payment and facilitate delivery. We may also save your information to facilitate new product orders or process returns.

- To provide, support, personalize, and develop our Web Site and products.
- To create, maintain, customize, and secure your account with us.
- To process your requests, purchases, transactions, and payments and prevent transactional fraud.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To help maintain the safety, security, and integrity of our Web Site, products, databases and other technology assets, and business.
- 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 California Consumer Privacy Act.
- 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 about our customers or Web Site users is among the assets transferred.

We will not collect additional categories of personal information or use the personal information we collected for 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.

We share your personal information with the following category of third parties:

- Our suppliers in order to enable them to ship our products to you.

### ***Disclosures of Personal Information for a Business Purpose***

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

Category A: Identifiers.

Category B: California Customer Records personal information categories.

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

- Our suppliers in order to enable them to ship our products to you.

### **Sales of Personal Information**

In the preceding 12 months, we have not sold personal information and we will not sell your personal information.

### **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 by any one of the following:

- Telephone: 1-800-967-5151.
- Website: <https://www.roslandcapital.com/contact>.
- Mail: Rosland Capital LLC, 11766 Wilshire Boulevard Suite 1200, Los Angeles, CA 90025
- Email: [compliance@roslandcapital.com](mailto:compliance@roslandcapital.com).

In addition, a consumer with a disability may access the Policy in an alternative format by submitting a request to us as indicated above.

Only you, or a person you designate as an authorized agent 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. We reserve the right to require verification of your authorized agent's identity and authority, which may include:

- Verification of your identity as described below;
- A power of attorney pursuant to California Probate Code sections 4000 - 4465 or otherwise sufficient in our discretion to establish your authorized agent's authority; and/or
- Your authorized agent's valid government-issued identification or other proof of identity acceptable to us in our sole discretion.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

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

We cannot respond to your request 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.

Making a verifiable consumer request does not require you to create an account with us. However, we do consider requests made through your password protected account sufficiently verified when the request relates to personal information associated with that specific account.

We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

We endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing.

If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. 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 your verifiable consumer 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 your request.