



PRIVACY POLICY

Effective January 1, 2020

HoganTaylor LLP and RainRock, LLC d/b/a HoganTaylor Technology, (collectively "HoganTaylor," "we," "us," "our," the "Firm" or "HT") is committed to protecting the privacy of anyone who provides us with their information, such as by visiting our websites (each a "Website"), registering to use our services or attending our events.

WHAT INFORMATION THIS NOTICE COVERS

This Privacy and Cookie Policy (the "Policy") is designed to tell you about our practices regarding collection, use, storage, and disclosure of information, including Personal Identifiable Information (PII) (collectively, "Your Information") we collect via our services, our websites or any of our mobile applications (collectively, the "Services") and the consent required for the use of Your Information. Please be sure to carefully read this Notice in its entirety before using a Website or submitting information to us in any other way.

WHAT INFORMATION WE COLLECT AND HOW IT IS COLLECTED

If you are merely a visitor, we automatically collect certain information about you, such as computer and software information and usage/visit information, including information obtained through cookies (see "What are Cookies?" below for details on the information collected through cookies and how it is used). This is anonymous information that does not personally identify you but is helpful for our marketing purposes, and also helps us to improve your experience on our Website.

IP ADDRESS

Your IP address is automatically assigned to your computer by your Internet Service Provider. An IP address may be identified and logged automatically in our server log files whenever a user accesses the Website(s), along with the time of the visit and the page(s) that were visited. Collecting IP addresses is standard practice and is done automatically by many websites, applications and other services. We use IP addresses for purposes such as calculating usage levels, diagnosing server problems and administering the Website(s). We may also derive your approximate location from your IP address.

While registration is not required for you to use a Website, there may be circumstances in which you choose to register for our services, to attend our events or to receive ongoing updates from HoganTaylor. In these cases, HoganTaylor may contact registrants to invite them to our events, provide them with information about our services, publications and products, or for other marketing purposes.

For example, you may choose to register for:

- **Email alerts**
HT offers an email alert service to Website visitors, in which we send subscribers email updates when new information is added to our Website. If you decide to subscribe, we will collect basic contact information about you, such as your name and email address.

- **Surveys**
HT may conduct surveys via our Website. Survey participants may be asked for PII or other information (name, contact information, etc.) in addition to the opinions or feedback. The type of information collected in surveys will vary.
- **Thought leadership registration**
HT occasionally requires registration in exchange for our thought leadership: white papers, articles, studies, reports, survey analysis, booklets, etc. Your PII or other information may be requested in registration forms and the type of information collected from you will vary. HT reserves the right to distribute certain thought leadership materials only to those who supply the requested information.
- **Event registration**
HT facilitates event registration via our Website or, at times, via third party websites. PII or other information may be collected via event registration forms and the type of information collected will vary. HT may share registrant information with third parties in association with the event. Examples of “third parties” include hotels, sponsors or co-sponsors, promoters, event organizers (including via third party websites), speakers, panelists, etc. Please check the details provided at individual events to understand fully how your information will be used and retained.
- **Our Services**
When you register for our services, you may be asked for information via onboarding documentation, such as a Job Arrangement Letter, which may include additional details with respect to the protection of Your Information. Should you provide any information to us in contemplation of receiving our services but then are unable to do so (for example, should we have a conflict of interest and be unable to provide services to you), any such information will be treated as if you were a client. For the types of information that may be requested of you as a client, please see “Client Information” below.
- **Career Opportunities**
If you have applied for employment with HoganTaylor, Your Information submitted with your job application will be added to our recruitment system and used for recruitment and other customary human resources purposes.

If you have registered on our Website, Your Information will be stored in our customer relationship management (CRM) system. Data of registrants who have been out of active use for 24-months will be deleted from our CRM system. Other retention periods may vary depending upon the purpose for your registration.

If you have opted out from receiving future HT thought leadership, event invitations or Firm communications, your contact details will remain on our opt-out list to prevent you from receiving any further publications, invitations or Firm communications from HT. This does not apply to any HT invoices or other communications we may be required to provide (for example, federal notifications in connection with tax services provided to you).

CLIENT INFORMATION

If you are our client, we may collect certain information from you, including, without limitation: Personally Identifiable Information (PII) such as your name, address, Social Security number (SSN), date of birth, marital status, and family relationships; business information such as your business’ employer identification number (EIN), tax identification number, corporate name and structure, and internal accounting methods; and financial information such as financial status, assets, income, tax information, retirement and estate plan information, transaction history,

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account balance, payment history, and investment objectives. This information may also be secured from the sources described below and is subject to the conditions stated below.

SOURCES

Your Information referenced in this policy may be secured or received from sources such as (i) Your transactions with us, our affiliates and third parties; (ii) Your broker-dealer, investment advisor or other representative to whom you have given permission to share Your Information with us; (iii) Your inquiries by mail, telephone, email or face-to-face conversations; (iv) interviews with any of the foregoing parties; and (v) agreements, applications, forms, statements, and other documents received from you or any of the foregoing parties; and (vi) any other information you submit voluntarily to us.

HOW WE USE, DISCLOSE AND PROTECT YOUR PERSONAL INFORMATION

USAGE AND DISCLOSURE

We use Your Information for the purpose(s) for which you provided it, such as to fulfill your request for services or information, to process and administer your requests, statements, to activate any online account you may have with us, to provide you with news, email offers and other information, to let you know about other information and services that may be of interest to you, and to tailor our online or other offerings to your preferences. We may also use Your Information to notify you of changes to this Policy or the Website.

We may disclose Your Information under the following circumstances: (i) to you, if you direct us to do so; (ii) to unaffiliated financial services providers, transfer agents, custodians and trustees, banks, financial representatives, proxy services, vendors, affiliates, licensees, licensors, solicitors, printers or third parties who assist us or who perform services on Our behalf in order to provide you with products and services or to affect transactions that you request or authorize; (iii) to third parties to market their products or services to you if you have consented to such disclosures (iv) to third parties if we are compelled to do so by law; (v) to third parties in order to protect any account you may have with us from fraud, misfeasance, malfeasance or other wrongful act; (vi) to enforce or apply our Terms and Conditions (<https://hogantaylor.com/terms-conditions/>) and other agreements, including for billing and collection purposes; and (vii) for any other purpose disclosed by us when you provide Your Information.

From time to time, we may be required to disclose Your Information in response to a court order, subpoena, government investigation or as otherwise required by law. We also reserve the right to report to law enforcement or other governmental agencies any activities that we, in good faith, believe to be unlawful. We also may disclose certain Information when we believe that such disclosure is reasonably necessary to protect the rights, property and safety of others or ourselves.

HT does not collect or compile PII we obtain for dissemination or sale to outside parties for consumer marketing purposes or host mailings on behalf of third parties. Except as stated in this Notice, we will not sell, license, transmit, or disclose Your Information outside of HT.

WEBSITE ANALYSIS

We may also combine anonymous usage information collected from your visit to the Website with that of other users to determine which features and areas of the website are most popular.

This aggregated information does not contain PII.

SECURITY

HT works to protect the confidentiality and security of information it obtains in the course of its business. We restrict access to Your Information to those personnel who have a business need to access it. We maintain physical, electronic and procedural safeguards to protect such Information from unauthorized access, acquisition or alteration. Access to such information is limited and policies and procedures are in place, designed to safeguard the information from loss, misuse and improper disclosure.

We use various security devices and methods where appropriate to protect Your Information depending on the nature of the Service. No data transmission over the Internet is 100 percent secure. We will take reasonable measures we believe appropriate to protect Your Information from loss, misuse, alteration or destruction; however, we cannot ensure or warrant the security of that Information.

WHAT ARE COOKIES?

Cookies are small text files placed on your computer by the websites that you visit. A cookie file is stored in your web browser and allows the Website or a third party to recognize you and make your next visit easier and the Website more useful for you. The use of cookies is now standard for most websites. Essentially, cookies are a user's identification card for the HT servers. Web beacons are small graphic files linked to our servers that allow us to track your use of our Website and related functionalities.

MANAGING COOKIES ON YOUR DEVICE

HT uses or may use cookies and/or web beacons to help personalize content and to provide you with an improved user experience. By using this Website you consent to the deployment of cookies. You can control and manage cookies using your browser (see below). Please note that removing or blocking cookies can impact your user experience and some functionality may no longer be available.

We use both session and persistent cookies on the Website and we use different types of cookies to run the Website:

- **Essential/strictly necessary cookies**
Some cookies we use are essential to the functioning of the Website.
- **Analytical/performance cookies**
Allow us to recognize and count the number of visitors and see how visitors move around the Website when using it. This helps us improve the way the site functions.
- **Functionality cookies**
Used to recognize you when you return to the Website. This enables us to personalize our content for you, greet you by name, and remember your preferences.
- **Targeting cookies**
Record your visit to the Website, the pages you have visited, and the links you have followed. We will use this information to make the Website more relevant to your interests.

THIRD PARTY COOKIES

Some content or applications, including advertisements, on the Website are served by third-parties, including advertisers, ad networks and servers, content providers, and application providers. These third parties may use cookies in conjunction with web beacons or other tracking technologies to collect information about you when you use our Website. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content. In addition to our own cookies, we may also use these third party cookies to report usage statistics of the Website and refine marketing efforts.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly. For information about how you can opt out of receiving targeted advertising from many providers, see below.

- **Tracking cookies**
Follow on-site behavior and tie it to other metrics, allowing better understanding of usage habits.
- **Optimization cookies**
Allow real-time tracking of user conversion from different marketing channels to evaluate their effectiveness.
- **Partner cookies**
Provide marketing conversion metrics to our partners so they can optimize their marketing efforts.

USING YOUR BROWSER TO CONTROL COOKIES

Most browsers allow you to view, manage, delete and block cookies for a website. Be aware that if you delete all cookies, then any preferences you have set will be lost, including the ability to opt-out from cookies as this function it requires placement of an opt out cookie on your device.

THIRD PARTY POLICIES

If we use agents, contractors or other companies to perform services on our behalf, we will require that they protect Your Information in accordance with this Policy. On the other hand, you must be comfortable with the privacy policies of any other sites You authorize to gather information from us, as the privacy policies of such other sites will govern the use of your Personally Identifiable Information once it has been transmitted by us.

GOOGLE ANALYTICS

Our sites use of Google Analytics, which uses cookies and similar technologies to collect and analyze information about the use of the services and report on activities and trends. If you are a registered user of our Websites and/or offerings, we may use this information, in combination with other information that you provide, to improve the services and other offerings of the program or website. This service may also collect information regarding the use of other websites, apps and online resources.

You can learn about Google's practices by going to www.google.com/policies/privacy/partners/ and may exercise the opt-out provided by Google by downloading the Google Analytics opt-out browser add-on, available at <https://tools.google.com/dlpage/gaoptout.>, or you can prevent Google Analytics from recognizing you on return visits to this site by disabling cookies on your browser. For additional information please see "How Google uses data when you use our partners' sites or apps," located here.

NOTICE OF PRIVACY RIGHTS TO CALIFORNIA RESIDENTS

If you are a California resident, California law requires that we provide you with a summary of your privacy rights under the California Online Privacy Protection Act (the "Act"), the Shine the Light Law (the "Law"), and the California Business and Professions Code and Civil Code (the "Codes"). As required by the Act, the Law and the Codes, we will provide you with the categories of personally identifiable information that we collect through this Website and the categories of third party persons or entities with whom such personally identifiable information may be shared for direct marketing purposes at your request. We are required to inform you, at your request: (1) the categories of personally identifiable information we collect and what third parties, we share that information with; (2) the names and addresses of those third parties; and (3) examples of the products marketed by those companies. We are also required to allow you to control who we can and cannot share that information with. To obtain this information, please send a request by email. When contacting us, please indicate your name, address, and what personally identifiable information you do not want us to share with third parties. The request should be emailed to us at policy@hogantaylor.com and labeled "California Customer Choice Notice." Please allow thirty (30) days for a response. Also, please note that there is no charge for controlling the sharing of your personally identifiable information or requesting this notice.

THIRD PARTY LINKS

Please be aware that HT, sometimes contains links to other sites that are not covered by this Notice. Visitors to the Website may be directed to third party sites for more information about thought leadership, events, content sponsorships, vendor services, government entities, nonprofits, and social networks.

In addition, we are not responsible for the information collection, use, disclosure or security policies or practices of any third party social media platform provider or other organization, including with respect to any Personal Identifiable Information you disclose to other organizations through or in connection with the Website, such as by using third party messaging services linked or integrated through the Website.

RETENTION PERIODS

We will retain Your Information for as long as needed or permitted in light of the purpose(s) for which it was obtained.

The criteria used to determine our retention periods include: (i) the length of time we have an ongoing relationship with you and provide the Website or offerings to you (for example, for as long as you have an account with us or keep using the Website or offerings); (ii) whether there is a legal or business obligation to which we are subject (for example, certain laws require us to keep records of your transactions for a certain period of time before we can delete them); or (iii) whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations regulatory investigations, or other legal matters).

NO INFORMATION FROM CHILDREN UNDER 13

This Website is not intended for use by children. HT believes in protecting the privacy of our children. With this belief, we do not knowingly collect or maintain PII on our Website from persons under 13 years of age, and no part of our Website is directed to persons under 13 years of age. We will take appropriate steps to delete any PII of persons less than 13 years of age that have been collected on our Website without verified parental consent upon learning of the existence of such PII.

CHANGES TO HOW WE DISCLOSE/USE YOUR INFORMATION

HT gives you choices regarding the collection and usage of Your Information. You are legally entitled to request details of the PII we are holding about you. HT provides you the ability to keep your PII accurate and up-to-date. If at any time you would like HT to rectify, erase or restrict the processing of your PII, or you would like to (i) obtain confirmation whether or not your PII is processed by HT, (ii) access your personal information, (iii) exercise your right to data portability or (iv) withdraw your consent to processing, please contact us.

If you do not want us to share Your Information with unaffiliated or non-agent third parties for promotional purposes, or if you do not wish to have your Information used by HT to promote our own or third parties' products or services, you can opt-out by e-mailing us at policy@hogantaylor.com. If you have registered for any HT related updates through www.hogantaylor.com, and do not wish to receive future e-mails, please visit our unsubscribe page within the application.

CHANGES TO THIS POLICY

HT reviews this Policy from time to time, and this Policy is subject to change. Any change, update or modification will be effective immediately upon posting on the Website. It is our policy to post any changes we make to our privacy policy on this page. If we make material changes to how we treat our users' personal information, we will notify you through a notice on the Website home page. The date the Policy was last revised is identified at the top of the page. You are responsible for periodically visiting our Website and this Policy to check for any changes.

ACCESS

Inquiries about the accuracy of identifying information previously submitted to HT through its Website, or requests to have outdated information removed, should be directed to: policy@hogantaylor.com. HT is committed to providing reasonable and practical access to visitors to allow them the opportunity to identify and correct any inaccuracies. When requested and practical, HT will delete identifying information from current operational systems.

When PII is retained, HT assumes responsibility for keeping an accurate record of the information once a visitor has submitted and verified the data. HT does not assume responsibility for verifying the ongoing accuracy of the content of PII. When practically possible, if HT is informed that any PII collected through a website is no longer accurate, HT will make appropriate corrections based on the updated information provided by the authenticated visitor.

USERS OUTSIDE THE UNITED STATES OF AMERICA

If you are a resident of a country within the European Union or are otherwise accessing our site from outside the United States of America, by using this site and providing us your PII, you hereby explicitly acknowledge and agree to (i) the transfer of such information to the United

States and (ii) the collection, use and disclosure of your personally identifiable information in accordance with this Policy.

CONTACT US

If you have questions or you do not feel that your concerns have been addressed in this Policy, please contact us.