



Privacy Policy

FinPro, Inc. ("**Company**" or "**We**" or "**Us**") understand that your privacy is important to you and we are committed to protecting it through our compliance with this policy.

This policy describes the types of information we may collect from you or that you may provide when you visit this website or any of FinPro's websites or any relevant subdomains. This list may include but is not limited to, <https://www.finpro.us>, <https://hub.finpro.us>, <https://cp.finpro.us>, <https://da.finpro.us>, <https://www.finprocapitaladvisors.com>. In addition, this policy also applies to FinPro's secure file transfer and communication environment through Microsoft Teams and SharePoint. Collectively these sites are referred to herein as our "Website" and this policy describes our practices for collecting, using, maintaining, protecting and disclosing that information may be collected from you or which you may provide when visiting FinPro's Website.

This policy applies to information we collect:

- On this Website.
- In e-mail, text and other electronic messages between you and this Website.
- Through mobile and desktop applications you download from this Website, which provide dedicated non-browser-based interaction between you and this Website.
- Through custom applications you interact with from this Website.

It does not apply to information collected by:

- Us offline or through any other means, including on any other website operated by any third party; or
- Any third party, including through any application or content (including advertising) that may link to or be accessible from the Website.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Website. By accessing or using this Website, you agree to this privacy policy. This policy may change from time to time (see ***Changes to our Privacy Policy***). Your continued use of this Website after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

Children Under the Age of 16

Our Website is not intended for children under 16 years of age. No one under age 16 may provide any information to or on the Website. We do not knowingly collect personal information from children under 16. If you are under 16, do not use or provide any information on this Website or on or through any of its features, register on the Website, make any purchases through the Website, use any of the interactive or public comment features of this Website or provide any information about yourself to us, including your name, address, telephone number, e-mail address or any screen name or user name you may use. If we learn we have collected or received personal information from a child under 16 without verification of parental consent or as part of a contractual service provided to you by the Company or one of its affiliates, we will delete that information. If you believe we might have any information from or about a child under 16, please contact us at finpro@finpro.us.

Information We Collect About You and How We Collect It

We may collect several types of information from and about users of our Website, including information:

- By which you may be personally identified, such as name, account number, postal address, e-mail address or telephone number ("personal information");
- That is about you but individually does not identify you; and/or
- About your internet connection, the equipment you use to access our Website and usage details.

We collect this information:

- Directly from you when you provide it to us.
- Automatically as you navigate through the site. Information collected automatically may include usage details, IP addresses and information collected through cookies and other tracking technologies.

Information You Provide to Us. The information we collect on or through our Website may include:

- Information that you provide by filling in forms on our Website. This includes information provided at the time of registering to use our Website, subscribing to various services, posting material, registering for conferences, or requesting other materials or further services. We may also ask you for information when you report a problem with our Website.
- Records and copies of your correspondence (including e-mail addresses), if you contact us.
- Your responses to surveys that we might ask you to complete for research purposes.
- Information uploaded by you as part of any services provided by the Company.

You also may provide information to be published or displayed (hereinafter, "posted") on public areas of the Website, or transmitted to other users of the Website or third parties (collectively, "User Contributions"). Your User Contributions are posted on and transmitted to others at your own risk. Although we limit access to certain pages, please be aware that no security measures are perfect or impenetrable. Additionally, we cannot control the actions of other users of the Website with whom you may choose to share your User Contributions. Therefore, we cannot and do not guarantee that your User Contributions will not be viewed by unauthorized persons.

Usage Details, IP Addresses, Cookies and Other Technologies. As you navigate through and interact with our Website, we may automatically collect certain information about your equipment, browsing actions and patterns, including:

- Details of your visits to our Website, including traffic data, location data, and other communication data and the resources that you access and use on the Website.
- Information about your computer and internet connection, including your IP address, operating system and browser type.

The information we collect automatically, if any, is statistical data, and does not identify any individual. It helps us to improve our Website and to deliver a better and more personalized service by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Website according to your individual interests.
- Speed up your searches.
- Recognize you when you return to our Website.

The technologies we use for this automatic data collection may include:

- **Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website.
- **Flash Cookies.** Certain features of our Website may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from and on our Website. Flash cookies are not managed by the same browser settings as are used for browser cookies. For information about managing your privacy and security settings for Flash cookies, see ***Choices about How We Use and Disclose Your Information***.

Our Sites do not track you by collecting personal data about your online activities over time and across third party websites or online services. Accordingly, we do not alter our data collection and use practices in response to “do not track” signals transmitted from web browsers.

Third-Party Use of Cookies and Other Tracking Technologies

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 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.

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 Choices About How We Use and Disclose Your Information.

How We Use Your Information

We use information that we collect about you or that you provide to us, including any personal information:

- To present our Website and its contents to you and enhance the quality of your experience on our web-sites.
- To provide you with information, products or services that you request from us.
- To fulfill any other purpose for which you provide it.
- To provide you with notices about your account, including expiration and renewal notices.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- To notify you about changes to our Website or any products or services we offer or provide through it.
- To allow you to participate in interactive features on our Website.
- In any other way we may describe when you provide the information.
- For any other purpose with your consent.
- To comply with the law, when certain information is necessary to satisfy our legal or regulatory obligations.

We may also use your information to contact you about our own and third-parties' goods and services that may be of interest to you. If you do not want us to use your information in this way, please check the relevant box located on the form on which we collect your data (the registration form). For more information, see Choices About How We Use and Disclose Your

Information.

Disclosure of Your Information

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may disclose personal information that we collect or you provide as described in this privacy policy:

- To our subsidiaries and affiliates.
- To contractors, service providers and other third parties we use to support our business and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of FinPro, Inc.'s assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which personal information held by FinPro, Inc. about our Website users is among the assets transferred.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- With your consent.

We may also disclose your personal information:

- To comply with any court order, law or legal process, including to respond to any government or regulatory request.
- To enforce or apply our terms of use and other agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of FinPro, Inc., our customers or others.

Choices About How We Use and Disclose Your Information

We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:

- **Tracking Technologies and Advertising.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe's website. If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly.

We do not control third parties' collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have

your information collected or used in this way. You can opt out of receiving targeted ads from members of the Network Advertising Initiative ("NAI") on the NAI's website.

Data Security

We have implemented generally accepted standards of technology and operational security to protect your personal information from accidental loss and from unauthorized access, use, alteration, disclosure, or destruction. Only authorized FinPro, Inc. personnel and third-party service providers are provided access to personal data, and these employees and service providers are required to treat this information as confidential. All information you provide to us is stored in servers that are maintained by Microsoft. Any payment transactions and data uploaded for utilization of certain subscriber-based services will be encrypted.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. We urge you to be careful about giving out information in public areas of the Website like message boards. The information you share in public areas may be viewed by any user of the Website.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

Your State Privacy Rights

State consumer privacy laws may provide their residents with additional rights regarding our use of their personal information.

Colorado, Connecticut, Virginia, and Utah each provide their state residents with rights to:

- Confirm whether we process their personal information.
- Access and delete certain personal information.
- Data portability.
- Opt-out of personal data processing for targeted advertising and sales.

Colorado, Connecticut, and Virginia also provide their state residents with rights to:

- Correct inaccuracies in their personal information, taking into account the information's nature processing purpose.
- Opt-out of profiling in furtherance of decisions that produce legal or similarly significant effects.

FinPro does not process any personal information of the customers of its clients for any other reasons than those expressly set forth in the engagement letter with the client. FinPro will never process any personal information of the customers of its clients with the purposes of any targeted advertising or sales.

Changes to Our Privacy Policy

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 by e-mail to the primary e-mail address specified in your account and through a notice on the Website home page. The date the privacy policy was last revised is identified at the bottom of the page. You are responsible for ensuring we have an up-to-date active and deliverable e-mail address for you, and for periodically visiting our Website and this privacy policy to check for any changes.

Contact Information

To ask questions or comment about this privacy policy and our privacy practices, contact us at:

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