

Rosland Capital – Privacy Policy

Effective Date: September 2, 2008

Last Modified: March 4, 2014

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.

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.

What Categories of Information Are Collected Through The Web Site?

- **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.

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. For example, if you purchase a product from the Web Site, 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 Privacy 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.
- **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 or by writing to us at:

Rosland Capital LLC, 1333 Second Street, Suite 200, Santa Monica, CA 90401

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.