

The privacy practices of this Privacy Policy apply to our services available under the domain and subdomains of www.pointolema.com (the “Site”). We recognize that privacy is important to our users, so we design and operate our Site with the protection of your privacy in mind. This Privacy Policy outlines the types of personal information we may gather when you visit our Site or use our services, as well as some of the steps we take to safeguard it. Please read this Privacy Policy in conjunction with our general [privacy policy](#) to learn more about the ways in which we protect, use and disclose your personal information. **By visiting the Site, you agree to be bound by the terms and conditions of both of our Privacy Policies. If you do not agree, please do not use or access the Site.**

By accepting the Privacy Policy, you expressly consent to our use and disclosure of your personal information in accordance with this Privacy Policy.

Collection of Information

In general, you can browse the Site without telling us who you are or revealing any personal information about yourself. We automatically track certain information that your browser makes available whenever you visit a website. This information includes your Internet Protocol address, browser type, browser language and one or more files that may uniquely identify your browser. We may use this information to do internal research on our users’ demographics, interests and behavior to better understand, protect and serve you and our clients. This information may include the URL that you just came from (whether this URL is on the Site or not), which URL you next go to (whether this URL is on the Site or not), your computer browser information and your IP address. We use this information to operate, develop and improve our services.

Use and Disclosure of Information

We use the information we collect from our browser and data collection devices to improve our operations and facilitate, and improve, the services you request. We may use information collected from you to measure interest and customize your experience. If you apply for a password, we use that data to determine whether you are an accredited investor and have sufficient sophistication, investment experience and wealth to receive information about certain investment options.

We may use personal information about you to analyze Site usage, improve our content and product offerings and customize the Site’s content, layout, and services. These uses improve the Site and better tailor it to meet your needs, so as to provide you with a smooth, efficient, safe and customized experience while using the Site.

In connection with providing our services, it also may be necessary for us to share personal information about you with other third parties to help us process transactions relating to your account, including, but not limited to, asset transfers from a financial institution and processing or administering investment transactions and portfolios. In certain instances, we may contract with third parties that are not affiliated with us to perform services for us, and, if necessary, we may disclose information about you to those third parties solely for the purpose of carrying out their assigned responsibilities. In those circumstances, we require those third parties to treat your private information with the same degree of confidentiality that we do. In some instances, the

third-party service provider may collect information directly from you. In these cases, you will be notified of the involvement of the service provider, and all additional information you provide them and their additional uses will be strictly up to you. If you provide additional information to a service provider directly, their use of your personal information is governed by their applicable privacy policy.

We may also share information about you if we believe that disclosure is required under law. For example, we may need to disclose information in response to a subpoena or to cooperate with regulatory or law enforcement authorities.

We cannot ensure that all of your private communications and other personal information will never be disclosed in ways not otherwise described in this Privacy Policy. By way of example (without limiting the foregoing), we may be forced to disclose personal information to the government or third parties under certain circumstances, third parties may unlawfully intercept or access transmissions or private communications, or service providers may abuse or misuse your personal information that they collect from the Site. Therefore, although we use industry standard practices to protect your privacy, we do not promise, and you should not expect, that your personal information or private communications will always remain private.

Control of Your Password and Personal Information

You are responsible for all actions taken with your Data Exchange user name and password. Therefore, we recommend that you do not disclose your password to any third parties. You may not allow others to use your user name or password to access or use any part of the Data Exchange. If your password has been compromised for any reason, you should contact the Data Exchange immediately.

Phishing

Identity theft and the practice currently known as “phishing” are of great concern to us. Safeguarding information to help protect you from identity theft is a top priority. We do not and will not, at any time, request your username, password, credit card information or national identification number in an unsolicited e-mail or telephone communication. For more information about phishing, visit the Federal Trade Commission’s website.

Children

Children (persons under the age of 18) are not eligible to use the Site and, therefore, we do not knowingly collect any personal information from persons under the age of 18.

Conditions Of Use

If you choose to visit the Site, your visit and any dispute over privacy is subject to this Privacy Policy and our general [Privacy Policy](#), including limitations on damages and application of the law of the State of California. If you have any concern about privacy, please send a thorough description to info@pointolema.com.

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Changes to this policy

Please note this Privacy Policy may change from time to time. We may amend this Privacy Policy at any time by posting the amended terms on the Site. All amended terms shall automatically be effective 30 days after they are initially posted on the Site. Your continued use of the Site constitutes your agreement to this Privacy Policy and any changes to this Privacy Policy. If we make any material changes to this Privacy Policy that affect your information already stored in our database, we will post a prominent notice on the Site stating that this Privacy Policy has changed. If you do not agree with this Privacy Policy or any changes to the Privacy Policy, please do not use or access the Site.

If you have any additional questions, please feel free to contact us any time at info@pointolema.com.