

## **PRIVACY POLICY**

This Privacy Policy describes the ways in which Landing Rock Group LLC (“we,” “our,” or “us”), operates the website [www.landingrock.com](http://www.landingrock.com) (the “Site”), collects, uses, and discloses information about you in connection with your use of the Site. By using the Site, you consent to the use of your information as set forth herein, now and as amended by us.

### **Our commitment to your privacy**

We respect and safeguard the privacy of everyone who uses the Site. We provide here a brief summary of our Privacy Policy for your convenience. Please read our entire Privacy Policy for complete detail about our privacy practices.

- We collect information directly from you when you create an account or use our services. To make full use of the Site, you must provide us with certain financial account information.
- We collect information about how you use our services. We may use cookies or similar technologies to collect this information.
- We may collect information about you from third-party sources that refer you to the Site.
- We do not share your personally identifiable information with advertisers.
- We use the information that we collect to manage your account, provide you with services through the Site and bill you for those services, deliver marketing communications, generate and analyze statistics and aggregate reports about users of the Site, and improve our tools and services.
- We may share your information with third parties as necessary to provide you with our services, to service providers operating on our behalf, to your financial advisor or other agents acting on your behalf (if you authorize us to do so), as required by law, in special circumstances (such as to protect our rights, your rights, or the rights of others), in connection with a corporate restructuring, or with your express consent.
- We use administrative, technical, and physical safeguards, including encryption and other security measures, to protect your information.
- We may update this Privacy Policy at any time.

### **What information do we collect?**

**Information You Provide** — We and our service providers collect any information that you voluntarily provide to us, including when you create an account on the Site or when you use the services available through the Site. If you register to join the Site, we will collect your name, contact information (including U.S. mailing address, email address and telephone number), and other registration information, such as a password for accessing the Site and your response to one

or more additional security questions that we may use to verify your identity. We may also ask you to provide, at your option, certain demographic information, such as your age, income, profession, and information about your financial assets. We may also collect information that you provide to us by email, telephone, or other means.

In order to make use of the full functionality of the Site, you must also provide information about financial accounts that you maintain with third-party financial institutions. We and our service providers collect this information, including your account numbers, online banking login credentials, and responses to security challenge questions, so that we can access your accounts at third-party financial institutions to provide you with services through the Site. We refer to this type of information as “Financial Account Information.” We do not use your personally identifiable Financial Account Information other than as provided for in this Privacy Policy.

Information Automatically Collected From Your Computer or Mobile Device — We and our service providers may automatically collect certain technical information from your computer or mobile device when you use the Site, such as your Internet Protocol address, your browser type, your operating system, the pages you view on the Site, the pages you view immediately before and after you access the Site, and the search terms you enter on the Site. This information allows us to recognize you and personalize your experience if you return to the Site using the same computer or mobile device, and to improve the Site and the services we provide. We and our service providers may collect this information using cookies, digital fingerprints, web beacons, page tags, pixels or similar tools that are set when you visit the Site or when you view an advertisement that we have placed on another site (“Clickstream Data”). Clickstream Data may include computer and connection information such as statistics on your page views, pathways to and from the Site, referral URL, ad data, IP address (which can be used to derive the location of your device), device identifiers, the type of operating system and browser you use, and other device settings. Clickstream Data also may include your browsing history, transaction history, your web log information and other information that may be aggregated and/or de-identified. Clickstream Data helps us suggest Products or service offerings that may be of interest to you. This information may be used by us (or third parties on our behalf) for the purposes described in this Online Privacy Policy or for other business purposes as permitted by law. For more information about how this Site uses cookies, web beacons, page tags, pixels and similar choices and your rights and choices, please see Cookies and Other Tracking Technologies below.

Information We Collect from Third Parties — We may collect information about you from third-party sources. For instance, should a friend, colleague, financial advisor or other third-party refer you to the Site, we may keep a record of the identity of that referring party as part of your account profile. Similarly, when you refer others to join the Site, we may record your name for the purpose of tracking the status of your referrals.

### **How do we use your information?**

We may use the information we collect for a number of purposes, including, but not limited to:

- providing you with products, services, or information related to the Site;
- billing you for products and services available through the Site;

- providing you with information about the Site or required notices;
- delivering marketing communications, promotional materials, or advertisements that may be of interest to you (however, we do not share your personally identifiable information for marketing);
- customizing your experience when using the Site, such as by providing interactive or personalized elements on the Site and providing you with content based on your interests;
- allowing us to improve the Site and the services we provide, such as by better tailoring our content to our users' needs and preferences;
- generating and analyzing statistics about your use of the Site, and users of the Site in the aggregate (including statistics about our users' Financial Account Information); and
- detecting, preventing, and responding to fraud, intellectual property infringement, violations of our Terms of Use, violations of law, or other misuse of the Site.

We also may combine or aggregate any of the information we collect through the Site or elsewhere for any of these purposes.

### **Under what circumstances do we disclose your information?**

We may disclose the information we collect from you through the Site:

- as necessary to provide you with products, services, or information related to the Site;
- to service providers who work on our behalf and are bound by confidentiality and privacy obligations;
- to your financial advisor or other agents acting on your behalf, if you authorize us or them to do so;
- as required by law, such as to comply with a subpoena or other legal process, or to comply with government reporting obligations;
- when we believe in good faith that disclosure is necessary (a) to protect our rights, the rights of other users of the Site, the integrity of the Site, or your safety or the safety of others, or (b) to detect, prevent, or respond to fraud, intellectual property infringement, violations of our Terms of Use, violations of law, or other misuse of the Site;
- to affiliates, service providers, advisors, and other third parties to the extent reasonably necessary to proceed with the negotiation or completion of a merger, acquisition, or sale of all or a portion of our assets; and/or
- pursuant to your express consent.

In addition, we may share aggregate reports on user demographics and traffic patterns, or other information that does not personally identify you, with any other third-party. This can include aggregate, non-personally identifiable information that is derived from Financial Account Information (such as the average or total balances of our users' financial accounts). We may also use such aggregate information to enhance our services and develop new service offerings. However, we do not sell or otherwise share your personally identifiable information with other companies so that they can market to you.

### **Third-party financial institutions**

When accessing a third-party financial institution on your behalf, we are acting as your agent and not as the agent of such third-party financial institution. All of your information, including Financial Account Information, that we may transmit to such third-party financial institution on your behalf is subject to such third-party financial institution's privacy policy and terms of use. You should review and be aware of each third-party financial institution's terms before linking your account at such institution to our service.

### **Third-party data providers**

In order to provide the broadest scope and reliability of services to you, we may from time to time use third-party data services to gather your Financial Account Information from financial institutions. By using our Site, you grant our third-party providers the right, power, and authority to act on your behalf to access and transmit your personal and financial information from the relevant financial institution.

### **Third-party websites**

The Site and communications from us may contain links to websites operated by third parties. You acknowledge and agree that we are not responsible for the collection and use of your information by such websites that are not under our control. We encourage you to review the privacy policies of each website you visit.

### **Where is your information stored?**

Information collected through the Site will be processed by us in and subject to the laws of the United States, which may not provide the same level protection for your information as your home country, and may be available to the United States government or its agencies under a lawful order made in the United States. By using the Site, you consent to such transfer to, and processing in, the United States.

### **How is your information secured?**

We are committed to protecting your information from unauthorized access, use, or disclosure. We maintain administrative, technical, and physical safeguards designed to protect the information collected through the Site. For example, we use SSL encryption technology to protect the transfer of your information. However, no information or communication system can be 100% secure, so we cannot guarantee the absolute security of your information. In addition, we are not responsible

for the security of information that you transmit to the Site over networks that we do not control, including the Internet and wireless networks.

### **Changes to this Privacy Policy**

We reserve the right to update this Privacy Policy from time to time by posting a new Privacy Policy on this page, and in some cases where changes are material we may also contact you via email or post a notice on our homepage to let you know of such changes. You are advised to consult this Privacy Policy regularly for any changes, and your continued use of the Site after such changes have been made constitutes acceptance of those changes.

### **Other agreements**

You may from time to time enter into binding legal agreements relating to certain services available through the Site, which may have terms that are different from those set forth in this Privacy Policy. In the event of any inconsistency, the terms of such other agreement shall control with respect to such services.

### **Do Not Call Policy**

We do not place marketing telephone calls to numbers appearing on a state or federal do not call list (unless permitted by applicable law) or to the number of a person who has requested not to receive telemarketing calls made by or on behalf of us. If you ask not to receive telemarketing calls from us, you will be placed on our internally-maintained do not call list and will not be called during any future telemarketing campaigns. Any request to be placed on our internally-maintained do not call list will be processed within a reasonable amount of time, not to exceed 30 days. Our employees involved in our telemarketing campaigns receive training on how to use our internally-maintained do not call list, and how to document, process and honor requests to be placed on our internally-maintained do not call list. It is our policy to honor a do not call request for five (5) years from the time the request is made. However, some states have do not call laws that require us to honor such a request for a longer period of time, and it is our policy to comply with those laws when applicable. Subject to applicable law, if you communicate with us by telephone, we may monitor or record the call. We reserve the right to revise this Do Not Call Policy

### **Additional Technology**

We use Google Analytics, a web analytics service provided by Google, Inc. (“Google”), on the Site. Google Analytics uses cookies or other tracking technologies to help us analyze how users interact with and use the Site, compile reports on the Site’s activity and provide other services related to Site activity and usage. The technologies used by Google may collect information such as your IP address, time of visit, whether you are a return visitor and any referring website. The Site does not use Google Analytics to gather information that personally identifies you. The information generated by Google Analytics will be transmitted to and stored by Google and will be subject to Google’s privacy policies. To learn more about Google’s partner services and to learn how to opt out of tracking of analytics by Google, click <https://www.google.com/policies/privacy/partners/>. In addition to Google Analytics, we use the Google Maps API to help pre-fill in address information. To learn more about Google’s privacy practices, click <http://www.google.com/policies/privacy>.

### **Sale, Assignment or Change of Control**

In the event of a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of any or all of our assets or liabilities, some of the personal information that we hold may be among the assets or liabilities transferred to a buyer or other successor. We may transfer to another entity or its affiliates or service providers some or all information about you in connection with, or during negotiations of, any merger, acquisition, sale of assets or liabilities or any line of business, change in ownership control or financing transaction.

### **Other Important Information**

You must be an individual of at least eighteen (18) years of age to use the Site. If you use the Site outside of the United States, you understand and consent to the transfer of your personal information to, and the collection, processing and storage of your personal information in, the United States and elsewhere. The laws in the United States and these countries regarding personal information may be different from the laws of your state or country.

### **Contact us**

If you have any questions about this Privacy Policy or our use of your information collected through the Site, please write to us at the address below:

Landing Rock Group LLC  
P.O. Box 1220  
Manhasset, NY 11030

This Privacy Policy was last updated on January 29<sup>th</sup>, 2019.