



## Rockport VAL / Rockport ENGINE Privacy Policy

**LAST UPDATED: 6 DECEMBER 2019**

This Privacy Policy explains how we collect your Personal Data (defined below) on those websites of Rockport VAL, LLC ("Rockport") and its service providers that post or link directly to this Privacy Policy (collectively, the "Site") and through offline means, how we use, disclose and protect such data, and the choices you have concerning our use of such data.

Please read this Privacy Policy carefully. Rockport may from time to time update this Privacy Policy. Any changes to this Privacy Policy will become effective when we post or link to the revised Privacy Policy on the Site. Please review the **LAST UPDATED** legend at the top of this page to determine when this Privacy Policy was most recently revised.

For the purposes of this Privacy Policy, "Rockport", "we", "us", and "our" means Rockport VAL, LLC and their affiliates.

You do not have to provide us with any Personal Data to visit the Site. However, if you choose to withhold requested information, you may not be able to visit all sections or use all features of the Site.

This Privacy Policy shall also apply to any Rockport application and other forms of Rockport's online activity that reference this Privacy Policy. In such instances, the term "Site" shall include any Rockport application or other Rockport online activity whenever that term is used herein. In connection with your use of any Rockport's application, your Personal Data (and Other Data, as described below) may also be collected and used by your device manufacturer, your telecommunication provider, or other third parties involved in the delivery of the application or data to your device, and

such collection and use shall be subject to the privacy policy of the applicable third party. Rockport is not responsible for any third party's privacy practices.

### **Types of Data Collected**

We gather Personal Data and Other Data (as described below).

### **Collection of Personal Data**

Personal data is information that identifies you or can be used to identify or contact you, e.g., your name, email address, address, or phone number ("Personal Data"). We may need to collect and process Personal Data in order to provide requested information, products, or services to you (including the Site) or because we are legally required to do so.

- Rockport requests Personal Data from you if the Site requires registration. The registration process requests that you provide your name, business email address, business address, business phone number, and company affiliation, and agree to the User Agreement presented at the time of registration.
- Rockport may receive Personal Data from social media platforms. For example, if you elect to use your social media credentials to log in to your Site account, certain Personal Data from your social media account will be shared with us, which may include Personal Data that is part of your social media profile.
- Rockport may collect Personal Data voluntarily provided by you, including in emails to the Site, online forms, order, and registration forms, surveys, promotion participation, phone calls, and online chats with Rockport's customer service and through other means.
- On some of Rockport's Sites, including [www.rockportval.com](http://www.rockportval.com), you are able to maintain "property" or "portfolios of property," where, if you are a registered

user, you have the option to list financial information and financial instruments in which you have an interest. To be useful, this information must be stored on the Site, and is accessible to anyone with whom you share your username and password. For this reason, please safeguard your username and password carefully and do not disclose it to any other person.

- We may use third-party payment services (each, a "Payment Service") to collect payments made through the Site. If you wish to make a payment through the Site, you may be directed to a webpage that is hosted by the Payment Service (or the Payment Service's service providers) and not by Rockport. Any Personal Data that you provide through a Payment Service page will be collected by Payment Service and not by Rockport, and will be subject to Payment Service's privacy policy, rather than this Privacy Policy. Rockport has no control over, and is not responsible for, Payment Service's use of information collected through the Payment Service page.
- Rockport may collect information through various other means, including participation at conferences and events, individual introductions, from employers that enroll their employees in our services, and from selected third-party business partners. From time to time, we may also acquire from third parties certain lists containing the names and contact information of individuals who may be interested in our products and services.

### **Use of Personal Data Collected**

We use Personal Data for legitimate business purposes, including the following:

- Fulfillment of Requests

Rockport may use Personal Data about you to deliver products and services to you and provide you with information about products and services you've ordered. We will engage in these activities to manage our contractual relationship with you and/or to comply with a legal obligation.

- Other Communications

From time to time, we may use Personal Data about you to inform you of products, programs, services, and promotions that we believe may be of interest to you. If you or your employer is a Rockport customer, we may also inform you of such products, programs, services, and promotions using Personal Data about you that you or your employer provided to Rockport. If you would prefer that we not send electronic marketing messages to you, please see **Your Choices** section below.

- Promotions

We may operate sweepstakes, contests, and similar promotions (collectively, "Promotions"). If you choose to enter Rockport Promotions, we typically ask you for certain Personal Data when you enter and, if applicable, win a Promotion. You should carefully review the rules of each Promotion in which you participate, as they may contain additional important information about our use of Personal Data about you. To the extent that the terms and conditions of such rules concerning the treatment of your Personal Data conflict with this Privacy Policy, the terms and conditions of such rules shall control. We use this information to operate the Promotions.

- Other Business Purposes

We may also use Personal Data about you for other business purposes, such as data analysis (for example, to improve the efficiency of our services), editorial and feedback purposes, providing customer support, customizing and improving the content and layout of the Site, completing business transactions (for example, to confirm content requested is received by customers), development of marketing and promotion plans and materials, statistical analysis of user behavior (for example, to understand what parts of the Site are of most interest to users), product development, market research, administering individual accounts, and meeting government regulatory requirements such as sales tax collection, audits, etc. We may also use Personal Data of journalist/media contacts for press release distribution or sharing other newsworthy developments related to our business activities. We engage in these activities to manage our contractual relationship with you, to comply with a legal obligation, and/or because we have a legitimate interest.

- **Administrative Communications**

Rockport reserves the right to use Personal Data to send to you important information regarding the Site, products, services, your account status, changes to the User Agreement, this Privacy Policy, or any other policies, agreements, or transactions relevant to your use of the Site, products and/or services. Because this information may be important to your use of the Site, products, and/or services, you may not opt-out of receiving such communications. We will engage in this activity to manage our contractual relationship with you and/or to comply with a legal obligation.

## **Collection and Use of Other Data**

We and our service providers may also collect and use the following types of data, referred to in this Privacy Policy as "Other Data":

- **Monitoring Data**

Rockport and its service providers may collect and/or track other information such as demographic information, domain names, computer type, browser types, screen resolution, and other statistical data involving the use of the Site ("Monitoring Data"). We use Monitoring Data to help us understand who uses the Site and to improve and market it, as well as our other web sites and services. Unless combined with Personal Data, Monitoring Data does not personally identify you or any other user, and we may use it for any purpose.

- **Aggregated Data**

We may aggregate Personal Data in a manner such that the end-product does not personally identify you or any other user of the Site, for example, by using information to calculate the percentage of our users who have a particular telephone area code. Such aggregate information may also be used for any purpose.

- **Cookies**

To enhance the Internet experience on the Site, Rockport and our service providers may use 'cookies' on the Site. Cookies are data that a web server transfers to an individual's computer for recordkeeping and other purposes. We use cookies and other technologies to facilitate users' ongoing access to and use of our Site. If you do not want information collected through the use of cookies, there is a simple procedure in most browsers that allows you to automatically decline cookies, or to be given the choice of declining or accepting the transfer of a particular cookie, or cookies from a particular web

site, to your computer. If cookies are disabled, however, all features of the Site may not operate as intended. Information about disabling cookies can be found on your Internet browser provider's web site. The Site may have a Cookie Policy that applies to its use of cookies and other similar tracking technologies. If it does, then the Cookie Policy will apply in addition to this Privacy Policy.

- Tools

We and our service providers may also use various common Internet tools such as 'pixel tags,' 'action tags,' 'web beacons,' '.gif tags,' 'JavaScript' or similar technologies (together, "Tools") in connection with Site pages and email messages in certain formats to, among other things, track the actions of Site users and email recipients, to determine the success of marketing campaigns and to compile statistics about Site usage and response rates. Tools allow us to count users who have visited certain pages of the Site, to deliver services, and to help determine the effectiveness of promotional or advertising campaigns. When used in email messages in certain formats, Tools can tell the sender whether and when the email has been opened. Rockport uses cookies and Tools to understand how the Site is used and to customize and enhance the Internet experience of individual users. When you revisit the Site, Rockport may recognize you by a Tool and customize your experience. For example, once you have completed the registration process, a cookie and/or Tool will be used to avoid having you register again. We believe cookies and Tools add value to the user experience. We do not respond to browser do-not-track signals at this time.

- Google Analytics

We use Google Analytics and HubSpot, which uses cookies and other similar technologies, to collect and analyze information about Site use and to report

on activities and trends. The service may also collect information regarding the use of other websites, apps and online resources. You can learn about Google's and HubSpot's practices by going to <https://policies.google.com/technologies/partner-sites> and <https://legal.hubspot.com/privacy-policy>.

- Verification

We may use third-party services to verify that you are a human user. Any information collected as part of such verification is subject to the privacy policy of the third-party service provider.

- IP Addresses

When you visit and interact with the Site, we and our third-party service providers may collect Internet Protocol (IP) addresses. Your IP address is a number that is automatically assigned to the computer that you are using by your Internet Service Provider (ISP). This number is identified and logged automatically in our server log files whenever you visit the Site, along with the time(s) of your visit(s) and the page(s) that you visited. We use IP addresses to understand how the Site is used by our users, to improve the Site, and to enhance user experience of the Site. We may also derive your approximate location from your IP address.

If we are required to treat Other Data as Personal Data under applicable law, then we may use and disclose it for the purposes described above, as well as for the purposes for which we use and disclose Personal Data as detailed in this Privacy Policy.

## **Our Advertising**



We may use third-party advertising companies to serve advertisements regarding products and services that may be of interest to you when you access and use the Site, our apps, and other websites or online services, based on information relating to your access to and use of the Site and other websites or online services on any of your devices, as well as on information received from third parties. To do so, these companies may place or recognize a unique cookie on your browser (including through the use of pixel tags). They may also use these technologies, along with information they collect about your online use, to recognize you across the devices you use, such as a mobile phone and a laptop.

If you would like more information about this practice, and to learn how to opt out of it in desktop and mobile browsers on the particular device on which you are accessing this Privacy Policy, <http://optout.aboutads.info/#/> and <http://optout.networkadvertising.org/#/>.

You may download the AppChoices app at <http://www.aboutads.info/appchoices> to opt-out of this practice in mobile apps.

## **Disclosure of Personal Data Collected**

We may disclose Personal Data for the following purposes:

- Third-Party Service Providers

We may provide Personal Data to third-party service providers, who provide services to us, including but not limited to, data analysis, order fulfillment, payment processing, and other services.

- Affiliate Communications

Rockport may transfer Personal Data among our affiliates to allow our affiliates to contact you regarding products, programs, services, and promotions that they believe may be of interest to you, and such affiliates may otherwise use your Personal Data in accordance with this Privacy Policy. If you would prefer not to receive marketing communications from Rockport or our affiliates, please see **Your Choices** section below. Rockport VAL, LLC will be the party responsible for jointly-used Personal Data.

- Strategic Partners and Co-Branded Sites.

From time to time, we may enter into a special relationship with another company that is not owned by or affiliated with Rockport to provide or promote joint products, services, applications, or features (together, "Jointly Offered Items"). These special relationships may include co-branded websites ("co-branded pages"). Any information, including Personal Data, that you provide in connection with one of these Jointly Offered Items, and/or on one of these co-branded pages, will be shared with our third-party partners. You should check these third parties' websites for information regarding their privacy practices. PLEASE NOTE THAT THIS PRIVACY STATEMENT DOES NOT ADDRESS THE PRIVACY OR INFORMATION PRACTICES OF ANY THIRD PARTIES. If you do not want Personal Data about you shared with such third parties, please do not provide Personal Data in connection with the Jointly Offered Items and/or co-branded pages.

- Third-Party Data Providers

If you subscribe to a Rockport product or service that contains third-party data, we may be required to provide your Personal Data to the third party as part of our reporting obligations. We will only do so if a third-party data provider conditions your receipt of their data on knowing your identity.

- Conferences and Events

When you attend a conference or event organized by Rockport, your name and contact information may be shared with other attendees.

- Promotions

We may share the Personal Data you provide in connection with Promotions with third-party sponsors of such Promotions (irrespective of whether such Promotions are hosted by us), or otherwise in accordance with the rules applicable to those Promotions.

- Assignment

We may disclose or transfer any and all Personal Data that we collect to an affiliated entity or a third party (and their respective advisors) in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including without limitation in connection with any bankruptcy or similar proceedings).

- Law Enforcement; Emergencies; Compliance

We may use and disclose Personal Data about you to others as we believe to be appropriate: (a) in compliance with laws, rules, or regulations in any country in which Rockport operates, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from government or public authorities, including government and public authorities outside your country of residence; (d) to enforce our Terms of Use; (e) to protect our operations or those of any affiliated entities; (f) to protect the rights, privacy, safety or property of Rockport, its affiliated entities, you, or others; and (g) to permit us to pursue available remedies or limit the damages that we may

sustain. For example, we may, to the fullest extent the law allows, disclose Personal Data about you to law enforcement agencies to assist them in identifying individuals who have been or may be engaged in unlawful activities.

## Your Choices

We give you choices regarding our use and disclosure of your Personal Data for marketing purposes.

- If you no longer want to receive marketing-related emails from us on a going-forward basis, you may stop receiving these marketing-related emails by sending an e-mail to [unsubscribe@rockportval.com](mailto:unsubscribe@rockportval.com).
- If you would prefer that we do not share your Personal Data on a going-forward basis with our affiliates or with unaffiliated third parties for their marketing purposes, you may cease this sharing by sending an e-mail to [unsubscribe@rockportval.com](mailto:unsubscribe@rockportval.com).

We will try to comply with your request(s) as soon as reasonably practicable. Please note that if you exercise the second option as described above, we will not be able to remove your Personal Data from the databases of our affiliates or unaffiliated third parties with which we have already shared your Personal Data i.e., to which we have already provided your Personal Data as of the date that we implement your request). Further, please note that requesting us not to share your Personal Data with affiliates or unaffiliated third parties may result in you no longer receiving any marketing emails from Rockport. Please also note that if you choose not to receive marketing-related messages from us, we may still send you important administrative messages, and you cannot elect to stop receiving such administrative messages unless you choose to stop receiving services from us.

You may also indicate your choices regarding marketing-related emails by contacting us via postal mail or telephone using the **Contact Information for Rockport** below, or if you have a Site profile/account, by changing your preferences on your Site profile/account at any time.

### **How you can access, change or suppress your Personal Data**

If you would like to request to review, correct, update, suppress, delete or otherwise limit our use of your Personal Data that has been previously provided to us, or if you would like to request to receive an electronic copy of your Personal Data for purposes of transmitting it to another company (to the extent this right to data portability is provided to you by applicable law), you may make a request by contacting us using the information provided in the **Contact Information for Rockport** below. We will respond to your request consistent with applicable law. For your protection, we may only implement requests with respect to the Personal Data associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable and consistent with applicable law. Please note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions that you began prior to requesting the change or deletion. There may also be residual information that will remain within our databases and other records, which will not be removed.

### **Links**

The Site may contain links to other Internet websites, including social media sites and third-party hosted collaboration tools. These linked sites are not under Rockport's control. We provide links only as a convenience, and Rockport does not endorse or control and is not responsible for, the privacy practices or the content of these linked sites. If you provide any Personal Data through any third-party website or choose to

communicate with us using third-party collaboration tools or other social media platforms, your transaction will occur on that third party's website (not the Site) and the Personal Data you provide will be collected by and controlled by the privacy policy of, that third party. We recommend that you familiarize yourself with the privacy policies and practices of any such third parties.

PLEASE NOTE THAT THIS PRIVACY POLICY DOES NOT ADDRESS THE PRIVACY OR INFORMATION PRACTICES OF ANY THIRD PARTIES, INCLUDING, WITHOUT LIMITATION, AFFILIATED ENTITIES THAT DO NOT POST OR LINK DIRECTLY TO THIS PRIVACY POLICY.

### **Security Measures**

Rockport has established reasonable organizational and technical measures to protect Personal Data within our organization from loss, misuse, or unauthorized access, disclosure, alteration, or destruction. Please note that while Rockport has endeavored to create a secure and reliable Site for users, no site is 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), please notify us of the problem immediately by contacting us using the information provided below **Contact Information for Rockport** (note that if you choose to notify us via physical mail, this will delay the time it takes for us to respond to the problem).

### **Data Integrity**

Rockport will use Personal Data only in ways that are compatible with the purposes for which it was collected, authorized by this Privacy Policy, or authorized by you. Rockport will take reasonable steps to ensure that Personal Data is relevant to its

intended use, and is accurate, complete, and current (as provided by you). Rockport depends on you to update or correct your Personal Data whenever necessary.

If we learn of a security breach, we may attempt to notify you electronically so that you can take appropriate protective steps. We may also post a notice on the Site if a security breach occurs. Depending on where you live, you may have a legal right to receive notice of a security breach in writing. If you have any questions about the security of your personal information, please contact us as indicated in the **Contact Information for Rockport** section below.

### **Retention Period**

We will retain Personal Data about you for as long as needed or permitted in light of the purpose(s) for which it was obtained and consistent with applicable law. The criteria used to determine our retention periods include: (i) the length of time we have an ongoing relationship with you; (ii) whether there is a legal obligation to which we are subject; and (iii) whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation or regulatory investigations).

### **Cross Border Transfer of Personal Data**

Your Personal Data may be stored and processed in any country where we have facilities or in which we engage service providers. In certain circumstances, courts, law enforcement agencies, regulatory agencies, or security authorities in those other countries may be entitled to access your Personal Data.

If you are located in the European Economic Area ("EEA"): Some of the non-EEA countries are recognized by the European Commission as providing an adequate level of data protection according to EEA standards (the full list of these countries is available on the EU Commission's adequacy list

online [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en). For transfers from the EEA to countries not considered adequate by the European Commission, we have put in place adequate measures, such as standard contractual clauses adopted by the European Commission, to protect your Personal Data.

### **Use of this Site by Minors**

This Site is not directed to individuals under the age of eighteen (18), and we request that these individuals do not provide Personal Data through this Site.

### **Sensitive Personal Data**

We ask that you not send us, and you do not disclose, any sensitive Personal Data **e.g.**, social security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background, or trade union membership) on or through this Site or otherwise to us.

### **Contact Information for Rockport**

Questions or concerns regarding Rockport's data protection practices should be addressed to:

Legal Department

Rockport VAL, LLC

505 Fifth Avenue, 26<sup>th</sup> Floor

New York, NY 10017

Phone: +1-212-603-5866

E-mail: [privacy@rockportval.com](mailto:privacy@rockportval.com)



If you choose to contact Rockport via e-mail about this Privacy Policy, please mark the subject heading of your e-mail "Privacy Inquiry."