

## alta5 Privacy Policy

alta5 Inc. ("alta5", "we", "us", or "our") recognizes the importance of keeping the information you ("you" or "your") provide to us private and secure. This Policy applies, in general, to all Internet sites operated by or on behalf of alta5 (the "Site") and related services (the "Services").

### 1. User Consent.

By using our Site or providing Personal Information to us, you are consenting to the collection, use and disclosure of your Personal Information as described in this Policy. If you do not consent to the collection, use and disclosure of your Personal Information as described in this Policy, do not use our Site.

### 2. Types of Information We Collect.

When we refer to "Personal Information" we mean information that allows someone to identify or contact you, including, for example, your name, address, telephone number, e-mail address, as well as any other non-public information about you that is associated with or linked to any of the foregoing information. When we refer to "Anonymous Information" we mean information that is not associated with or linked to your Personal Information and which cannot be identified as belonging to you.

We may collect Personal Information from you, such as your first and last name, mailing address, phone, e-mail address, age, investment background, and similar information when you create an account. Our Site may collect information from you, including your browser type, operating system, IP address.

### 3. Use of Your Personal Information.

Whenever we collect Personal Information on our Site, we will:

- not disclose, transfer, sell or otherwise provide your Personal Information to any third party unless required by law or as expressly stated herein;
- provide timely and appropriate notice to you about our data practices through this Privacy Policy Statement;
- collect and use your Personal Information only with your consent, which may be express or implied, depending on the sensitivity of the Personal Information, legal requirements, and other factors;
- collect your Personal Information only for specific, limited purposes. The information we collect will be relevant, adequate and not excessive for the purposes for which it is collected;
- process your Personal Information in a manner consistent with the purposes for which it was originally collected or to which you have subsequently consented; and
- not use your Personal Information for direct marketing purposes without giving you an opportunity to "opt-out".

We may use Personal Information:

- to create your account and provide the Services you request;
- to access the third party services you specifically request access to;
- to provide improved administration of our Site and Services;
- to send you administrative e-mail notifications and other Services related communications;
- to make telephone calls to you, as a part of secondary fraud protection or to solicit your feedback;
- to send newsletters, surveys, offers, and other promotional materials related to our Services and for other marketing purposes;
- to contact you regarding opportunities to compensate you for your algorithm's performance;
- to share anonymized and/or aggregated algorithm performance statistics with third parties, for example potential investors or for marketing purposes; and
- to market our products and services (and those of third parties) to you that we believe may be of interest, both on and off the Site.
- to facilitate communication with other Members of the Site as you direct us through the Services.

#### 4. Control and Retention of Personal Information.

We will periodically send you free newsletters and e-mails that directly promote the use of our Site or Services. When you receive newsletters or promotional communications from us, you may indicate a preference to stop receiving further communications from us and you will have the opportunity to "opt-out" by following the unsubscribe instructions. Even if you opt-out of receiving marketing related email messages, we will continue to send you service related communications, including notices related to your Account or any updates to our Terms of Use or Privacy Policy. We retain the Personal Information collected on our Site as long as necessary to provide the services, products and information you request or as permitted by applicable law.

#### 5. Security of Personal Information.

Your Personal Information will generally be stored in our or our servers (which are hosted by a third party service provider) located in the United States. To the extent required by law, if your Personal Information will be transferred outside of this country, an appropriate notice will be provided. We maintain safeguards to protect the confidentiality, security and integrity of your Personal Information. However, as is the case with all computer networks linked to the Internet, we cannot guarantee the security of information provided over the Internet and will not be responsible for breaches of security unless we have acted in a grossly negligent manner.

#### 6. Use of Anonymous Information.

We may create Anonymous Information records from Personal Information by excluding any information that makes the information personally identifiable to the data subject. We use this Anonymous Information to so that we may enhance the content of our Services and improve Site

performance. alta5 reserves the right to use Anonymous Information for any purpose and disclose Anonymous Information to third parties at its sole discretion.

#### 7. Third Party Service Providers.

We may share your Personal Information with third party service providers to: provide you with the Services that we offer you through our Site; conduct quality assurance testing; facilitate creation of accounts; process any payments; provide technical support; and/or provide other services to the alta5. These third party service providers are required not to use your Personal Information other than to provide the services requested by alta5.

We will not sell Personal Information collected from our Internet sites to mailing list brokers. We may, however, share your Personal Information with third parties we hire to perform support services for us. These third parties are required to use the Personal Information we share with them only to perform services on our behalf and to treat your Personal Information as strictly confidential.

In some cases, we may share your Personal Information with third parties who partner with us to provide products and services to our customers. When we do so, we will require our business partners to use the Personal Information we share with them in a manner consistent with the purposes for which it was originally collected (or to which you subsequently consented) and only as permitted under this Policy and all applicable privacy and data protection laws.

In certain, limited circumstances we may share or transfer Personal Information to unrelated third parties. For example, we may provide Personal Information to a third party: (i) at your request; (ii) to comply with a legal requirement or court order; (iii) to investigate a possible crime, such as identity theft; (iv) in connection with the sale, purchase, investment in, merger, reorganization, liquidation or dissolution of our company or business; or (v) under similar circumstances. If such an event occurs, we will take appropriate steps to protect your Personal Information.

#### 8. Third Party Websites.

Our Site may contain links to Internet sites that are not operated by us. These links are provided as a service and do not imply any endorsement of the activities or content of these sites, nor any association with their operators. We do not control these Internet sites and we are not and cannot be responsible for their content, security, or privacy practices. We urge you to review the privacy policy posted on those other websites you visit before using the site or providing Personal Information.

#### 9. Use of Cookies.

We use cookies on this site. We may link the information we store in cookies to any personally identifiable information you submit while on our site. We may use both session ID cookies and persistent cookies. We may use session cookies to make it easier for you to navigate our site. A

session ID cookie expires when you close your browser. A persistent cookie remains on your hard drive for an extended period of time. You can remove persistent cookies by following directions provided in your Internet browser's "help" file. If you reject cookies, you may still use our site. Some of our business partners (e.g., our analytics provider) may use cookies on our site. We have no access to or control over these cookies. This privacy statement covers the use of cookies by us only and does not cover the use of cookies by any such firm. A cookie is a small text file that is stored on a user's computer for record-keeping purposes.

#### 10. Users Outside of the United States.

If you are a non U.S. user of the Site or Services, by visiting the Site and/or providing us with information, you acknowledge and agree that your Personal Information may be processed for the purposes identified in the Privacy Policy. In addition, your Personal Information may be processed in the country in which it was collected and in other countries, including the United States, where laws regarding processing of Personal Information may be less stringent than the laws in your country. By providing your information, you consent to such transfer.

#### 11. Children.

Our Services and Site are not directed to children and children are not eligible to use our Services. Protecting the privacy of children is very important to us. We do not collect or maintain Personal Information from people we actually know are under 13 years of age, and no part of our Site or Services is designed to attract people under 13 years of age. If we later learn that a user is under 13 years of age, we will take steps to remove that user's Personal Information from our databases and to prevent the user from utilizing the Site and the Services.

#### 12. Changes in this Privacy Statement.

If we decide to change our privacy policy, we will post those changes to this privacy statement, the homepage, and other places we deem appropriate so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. We reserve the right to modify this privacy statement at any time, so please review it frequently. If we make material changes to this policy, we will notify you here, by email, or by means of a notice on our home page.

#### 13. Contact Us.

If you have any questions or suggestions regarding our privacy policy, please contact us at [privacy@alta5.com](mailto:privacy@alta5.com).

Last Revised: May 23, 2015