

Privacy Policy

SFR Capital LLC, its subsidiaries and affiliates, successors, assigns, vendors and third-party suppliers (collectively, the “Company”) will endeavor to store personal information transmitted by you in connection with your use of the Company’s websites (the “Website”) in a secure environment that is suitable to the types of information being processed. This Privacy Policy applies to the Website and any variations or successors to it, any domain address that resolves to the Website, any Company computer software or applications, downloadable or otherwise, available from the Website (the “Software”) and any Company services purchased or otherwise made available from the Website (the “Services”) (the Website, the Software, and the Services are referred to collectively as the Site “Site”). The Site is a secure environment that is suitable to the types of information being processed. Access to the Site is restricted to personnel who have a need to know such information in order to provide you the products and services presented on or accessed via the Site or who otherwise need to utilize this information in accordance with the provisions of this Privacy Policy. References to “you” and “your” are references to you and/or your employer, as appropriate in the context. For purposes of this Privacy Policy, “Materials” refers to, without limitation, any and all audio and visual works or content in any medium or format, including, without limitation, film, video, text, logos, artwork, graphics, pictures, images, advertisements, aural and other forms of expression, whether in still, live, animated or streaming format, contained in works posted, uploaded or provided to the Company, the Site, or the technologies described herein, in any method or form, by you, or anyone on your behalf.

Types of Information the Company May Collect from You

Registration. Prior to your using the Site, the Company may require certain Personal Information and Non-Personal Information to create an account (“Account”) or to enable features or functionality of the Site. Failure to provide all information required by the Company may prevent access to any or all of the Site, and failure to maintain accurate information may result in suspension or termination of access to any or all of the Site.

“Personal Information” refers to information that lets the Company know the specifics of who you are and that may be used to identify, contact or locate you. Personal Information may include your name, mailing address, telephone number, e-mail address, billing address, payment information, financial institution information, information about uploads, your domain name, your internet service provider’s (“ISP”) domain name, your Internet Protocol (“IP”) address, your browser type and operating system, and the device used to upload the Materials (this data may be meta-data embedded in the Materials) and other information relating to uploaded Materials or that may be used to identify, contact, or locate you. The Company may collect Personal Information when you use the Site including, without limitation, when you set up your account, upload or download Materials, correspond or otherwise communicate with the Company through the Internet, or otherwise volunteer information about yourself.

“Non-Personal Information” refers to information that, by itself, does not identify you or could not be used to identify you as a specific individual (e.g., demographic information, website visitations, or other actions you may take). The Company may collect Non-Personal Information through any of the methods discussed below as well as automatically through use of various technologies, some of which are described further below.

How the Company May Collect and User Your Information

Uploading and Downloading Materials. If you use the Services and you upload or post Materials to or download Materials from the Site, the Materials may include meta-data or be transmitted with data, such as, without limitation, the type of device through which the Materials were created, the device’s IP address, the domain name of your Internet service provider and other such data. This data may necessarily be provided to and collected by the Company when Materials are uploaded, posted to or downloaded from the Site.

Information Collected Through Technology. While you are able to visit the Website and remain anonymous, the Company or its third party service providers may still collect Personal Information and Non-Personal Information about your use of the Site (e.g., your Internet browser, operating system, IP address, connection speed, and the domain name of your Internet service provider). Such information may be gathered by the following methods:

Cookies. Cookies, including local shared objects, are small pieces of information that are stored by your browser on your computer’s or device’s

hard drive which work by assigning to your computer or device a unique number that has no meaning outside of the Website. Cookies do not generally contain any Personal Information. Most web browsers automatically accept cookies, but you can usually configure your browser to prevent this. Not accepting cookies may make certain features of the Site unavailable to you, or not perform properly for you.

IP Address. You may visit areas of the Website anonymously without the need to register an Account. Even in such cases, the Company may collect IP addresses automatically. An IP address is a number that is automatically assigned to your computer or device whenever you begin services with an Internet service provider. Each time you access the Website and each time you request one of the Company's pages, the server logs the IP address.

Web Beacons. Web beacons are small pieces of data that are embedded in web pages and e-mails. The Company may use these technical methods in HTML e-mails that the Company sends to you to determine whether you have opened those e-mails and/or clicked on links in those e-mails. The information from use of these technical methods may be collected in a form that is Personal Information.

How the Company May Use Your Information

Information collected from you and recorded about you in connection with your use of the Site, including all clickstream information, telephone conversations and electronic communications, may be retained by The Company and associated with your name and other information collected about you by the Company.

Such information may be used by the Company or its agents: (i) in order to allow us to provide you with the products and services included within or accessible from the Site; (ii) in order for us to provide you with access to or from other Web sites or services which contain additional, and sometimes co-mingled products and services; (iii) for system development purposes, (iv) in connection with any user or customer agreement ("Agreement") between you and the Company or as otherwise agreed by you; (v) in connection with our client management systems; and (vi) to satisfy legal and regulatory compliance requirements (collectively, "permitted uses").

System Administration. The Company may use Non-Personal Information for the purposes of system administration, assisting in diagnosing problems with the Company's servers, monitoring the Company's system performance and traffic on the Site and to gather broad demographic information about the Company customers.

Personalization. The Company may use Cookies and IP Addresses to track features such as delivering Materials specific to your interests and informing you of new, relevant services or certain third party offerings. Performance of Services of the Site. If you have registered for an Account, the Company may use your Personal Information to make payments to you; to receive payments from you; to prepare tax information; to offer services to you; and to procure services from you and to communicate with you about these activities.

Notices to Registered Users. If you have registered for an Account, the Company may use your Personal Information to send e-mails to you regarding your registration, including confirmation to verify the accuracy of any information you have provided, and instructions on how to post Materials, make a payment or receive a payment or refund. The Company may also send you e-mails to verify your identity or to notify you if the Company believes your use of Site violates any applicable agreement for the use of the Site.

Advertising. The Company may use Non-Personal Information to assist in optimizing the delivery of advertisements to viewers of your Materials.

Contact Information. If you contact the Company by any means, the Company may keep a record of your contact information and correspondence. If you report a problem with the Site, the Company may collect this information in a file specific to you.

Use of Tracking Materials. If you use the Site and you upload or post Materials to, or download Materials from, the Site or to or from a third party website, the Company tracks and captures Personal and Non-Personal Information associated with registered Accounts and the use of Materials.

How to Access and Change Your Personal Information

Upon request, you may update or correct Personal Information previously submitted to the Site, but only to the extent such activities will not compromise privacy or security interests, as determined by the Company at its sole discretion.

Disclosure of Information to Third Parties

We may transfer or disclose your personal information to other entities as contemplated by the permitted terms of use. For instance, we may disclose your personal information to our agents or other third parties who are contracted to perform services on behalf of the Company, such as those who assist the Company in bringing you the Site and providing you with certain services, features and functionality included within or accessible via the Site.

The Company may provide or license to third parties data reflecting, for example, the activity of users of the Site or the use of products or services offered, but The Company will not identify you as the source of such data.

The Company does not sell, trade or rent Personal Information collected through the Site to any third party.

Notwithstanding the foregoing, the Company may share your Personal Information for the following purposes and to the extent necessary in the Company's good-faith discretion: (i) as reasonably necessary for the operation of the Site; (ii) to fully cooperate with governmental, regulatory authorities, law enforcement authorities, or self-regulatory organizations in response to regulatory inquiries or to comply with applicable laws, rules, regulation, orders, subpoenas, or other legal processes; (iii) if the Company believes your actions violate any laws, rules, or regulations, the Terms and Conditions, or any functions of the Site; and (iv) in the event of insolvency, bankruptcy, merger, acquisition, sale, joint venture or other business combination involving the Company.

Safeguarding Your Personal Information

Security Measures. The Company takes appropriate security measures to protect against unauthorized access, alteration, disclosure or destruction of Personal Information. These include, but are not limited to: (i) internal reviews of the Company's data collection; (ii) internal reviews of storage and processing practices; (iii) internal reviews of electronic security measures; (iv) internal reviews of physical security measures to guard against unauthorized

access to systems where the Company stores Personal Information; and (v) all the Company employees, contractors and agents who access Personal Information are bound by confidentiality obligations and may be subject to discipline, including termination and criminal prosecution for unauthorized use or disclosure of Personal Information.

Third Party Links. The Site may contain links to third parties who may collect Personal Information and Non-Personal Information directly from you. Additionally, the Company may use third parties to provide components of the Site. In either case, such third parties may have separate privacy policies and data collection practices, independent of the Company. The Company: (i) has no responsibility or liability for these independent policies or actions; (ii) is not responsible for the privacy practices or the Materials of such websites; and (iii) does not make any warranties or representations about the information, content, materials, products or services offered on such websites or the security of any information you provide to them.

International Users and Transfer of Data

The Site is operated from the United States and is subject to United States law. By providing Personal Information to us through the Site, you are consenting to the transfer of such Personal Information and the use of such Personal Information in accordance with the terms of this Privacy Policy.

Changes to the Company's Privacy Policy

The Company continually strives to implement new technologies and processes to better protect you, your privacy and your use of the Site, and to improve the cost-effectiveness of the Software and Services. As a result, changes to this Privacy Policy may be made by the Company from time to time.

Use of the Site by Minors is Prohibited

Use of the Site by minors under the age of 18 ("Minors") is prohibited.

Revisions to this Privacy Policy

The Company may revise this Privacy Policy at any time at its sole discretion, and you should review this Privacy Policy whenever accessing or using the Site. Your use of the Site after the posting of any such revisions to the Privacy Policy will constitute your acceptance of such revisions.

Consent

By using the Site and providing any information that may be required, invited or otherwise collected by the Company as set out above, you freely consent to the Company and its affiliates using your information or disclosing your information to third parties for the purposes set out herein.

How to Contact Us

Should you have any questions or concerns about the information we hold about you, or if you want to withdraw your consent, please contact us at investor_relations@sfrcapital.net and put “**Privacy Policy**” in the subject line.