

# Privacy Policy

This Privacy Policy describes how Elion Partners (referred to in this Privacy Policy as “Company,” “we,” “us” or “our”), as the operator of the [www.elionpartners.com](http://www.elionpartners.com) (the “Site”) and the associated client portal (the “Portal”), and the services provided through the Site and the Portal (the Site, the Portal and these services constituting the “Service”), collects information when you visit the Service. The purpose of this Privacy Policy is to provide you with information concerning how we collect, use, maintain and share your personal information in accordance with applicable data protection laws. This Privacy Policy is part of, and is governed by, the terms and conditions set forth in our Terms of Service located herein. By using the Service, you consent to the use of your information as set forth in this Privacy Policy

**Information Collected through the Service.** We may collect one or more of the following categories of personal information about the users of the Service when they (i) visit the Site or Portal; (ii) request additional information about the Service; or (iii) otherwise interact with us.

Category of Personal Information Collected	Examples	Source of Personal Information	Business Purpose for Collection of Personal Information
<b>Identifiers</b>	Name (first and last); E-mail address; Telephone number; Driver’s license or government-issued identification card number; Passport number; Date of birth; IP address; Information (posts, comments, stories, reviews) that you post on social media accounts.	Information you provide when completing a subscription agreement or otherwise register on the Portal; Communications with you; Cookies and other web technologies; Social media; Third-party service providers.	Identification; Providing our Service, including communicating with you or processing/facilitating financial transfers or payments; Legal & Regulatory Compliance.
<b>Financial Information</b>	Assets; Income; Tax information; Beneficiary information; Personal bank account information; Broker/dealer; Financial advisor, custodian, and similar parties; Information regarding your	Information you provide when completing a subscription agreement or otherwise register on the Portal; Communications with you.	Identification; Providing our Service, including communicating with you or processing/facilitating financial transfers or payments; Legal & Regulatory Compliance.

	<p>transactions with us, our affiliates and/or broker/dealers or other financial service providers participating in the sale of the securities offered through us, such as your account balances and transactional history.</p>		
<p><b>Internet, Computer or Other Similar Network Activity</b></p>	<p>Your browser type and version; Computer and connection information; IP address and standard web log information; Pages you visit within the Service; Date and time of your visit to the Service;</p> <p>Amount of time you spend using the Service;</p> <p>Operating system and platform; and Frequency and duration of use of the Service.</p>	<p>Cookies and other web technologies.</p>	<p>Identification; Providing our Service, Legal &amp; Regulatory Compliance.</p>
<p><b>Geolocation Data</b></p>	<p>Location of your mobile device.</p>	<p>Cookies and other web technologies.</p>	<p>Identification; Providing our Service, Legal &amp; Regulatory Compliance.</p>

**Cookies Policy.** We may automatically collect information from you when you use the Service using “cookies” and other similar technologies, such as web beacons, to automatically collect information about you when you use the Service. Cookies are small amounts of data that are stored within your computer’s Internet browser and that are accessed and recorded by the websites that you visit so that they can recognize the same browser navigating online at a later time. You can set your browser to reject cookies or to notify you when you are sent a cookie. However, if you disable cookies you may not be able to log in to the Service or to use certain features of the Service. To find out more about cookies, including how to see what cookies have been set on your device and how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

**How We Use the Information We Collect.** We collect information from and about you in order to:

- identify you as a customer;
- establish and maintain your customer accounts and/or process transactions in your account;
- communicate and share information with the custodians, transfer agents, and, if applicable, your broker/dealer or investment advisor, or other similar parties involved in the processing, servicing or administering of your account or the transactions effected in your account;
- market investment products or services that may be consistent with your financial profile; and
- meet our obligations under the laws and regulations that govern us.

We also use the information we gather through the Service to assure compliance with applicable laws and regulations, as well as to help us better understand how the Service and our products and services are being used. By identifying patterns and trends in usage, we are able to better design the Service and our products and services to improve your experience. In addition, we may use this information to contact and communicate with you and to respond to your communications and requests. If you are a registered user of the Portal, we may email you about products and services that we believe may be of interest to you. If you wish to opt-out of receiving these emails from us, please follow the instructions contained in each email you receive from us, which will allow you to opt-out of receiving further email marketing communications from us.

**Disclosures of Personal Information.** We do not sell your personal information. However, in order for us to provide our Service, we may share your personal information with the following categories of recipients:

- Third Parties. We may disclose all of the nonpublic personal information we collect about you as described above to the following types of third parties:
- Our Affiliated Companies. We may offer investment products and services through certain of our affiliated companies, and we may share all of the nonpublic personal Information we collect about you with such affiliates so we are better able to serve your investment needs and to suggest services or educational materials that may be of interest to you.
- Nonaffiliated Third-Party Service Providers and Joint Marketing Partners. From time to time, we use outside companies to perform services or functions on our behalf. We may disclose all of the nonpublic personal information we collect as described above to such companies. However, before we disclose nonpublic personal information to any of our third-party service providers, we require them to agree to keep your nonpublic personal information confidential and use the information only for the purposes for which disclosure to them is made.
- Other Nonaffiliated Third Parties. We do not sell or share your nonpublic personal information with nonaffiliated outside marketers. We may disclose your nonpublic personal information to the extent permitted or required by law. For example, to:
  - protect the security and integrity of our Web site;
  - effect, administer or enforce a transaction requested or authorized by you;
  - protect the security and integrity of our records;
  - protect our rights and property and the rights and property of others;
  - take precautions against liability;
  - respond to claims that your information violates the rights and interests of third parties;

- take actions required by law or to respond to judicial process;
- assist with detection, investigation or reporting of actual or potential fraud, misrepresentation or criminal activity; and
- provide information to law enforcement agencies or for an investigation on a matter related to public safety to the extent permitted under other provisions of law.
- **Business Transfers; Bankruptcy.** In the event of a merger, acquisition, bankruptcy or other sale of all or a portion of our assets, any user information owned or controlled by us may be one of the assets transferred to third parties. We reserve the right, as part of this type of transaction, to transfer or assign your information and other information we have collected from users of the Service to third parties. Other than to the extent ordered by a bankruptcy or other court, the use and disclosure of all transferred user information will be subject to this Privacy Policy. However, any information you submit or that is collected after this type of transfer may be subject to a new privacy policy adopted by the successor entity.
- **Analysis.** We use your information for improving the Service, including by (i) combining or aggregating any of the information collected through the Service or elsewhere for generating and analyzing statistics about your use of the Service and user demographics and traffic patterns and (ii) using anonymized data that may or may not be derived from personal information but does not personally identify you, both for disclosure to third parties and for the purpose of enhancing the Services and developing new Service offerings. The legal basis for such use are the Site's Terms of Services and this Policy and our legitimate interest in improving the Services.
- **Other Disclosure.** We may also disclose personal information about you to others: (a) with your valid consent to do so; (b) to comply with a valid subpoena, legal order, court order, legal process, or other legal obligation; (c) to enforce any of the terms and conditions or policies; or (d) as necessary to pursue available legal remedies or defend legal claims

**Aggregate Information.** We may share information relating to users of the Service with affiliated or unaffiliated third parties on an anonymous, aggregate basis. While this information will not identify you personally, in some instances these third parties may be able to combine this aggregate information with other data they have about you, or that they receive from third parties, in a manner that allows them to identify you personally.

**Security and Retention of Personal Information.** We implement industry standard security measures intended to protect against the loss, misuse and alteration of the information under our control. Please be aware that no data transmission over the Internet can be guaranteed to be 100% secure. As a result, the Company cannot guarantee or warrant the security of any information you transmit on or through the Service and you do so at your own risk. We will only retain your personal information for as long as is necessary to fulfill the purposes for which it was collected, including for the purposes of satisfying any legal, regulatory, accounting or reporting requirements.

**Use of Information Outside Your Country of Residence.** If you choose to use the Service or provide your information to us, your information may be transferred to, processed and maintained on servers or databases located outside of the country or jurisdiction where you are located, including to countries that have not been deemed to have an adequate level of protection for the rights and freedoms of data subjects. If we do transfer your personal information to another jurisdiction, we will

do so following due diligence and provided that the data recipient is subject to contractual agreements imposing obligations on it to ensure appropriate technical and organizational measures are implemented and maintained at all times to prevent the unauthorized and unlawful processing of personal information, and the accidental loss or destruction of, or damage to, personal information, consistent with our obligations under applicable data protection laws.

**Your Choices & Rights.** Depending upon where you reside, certain choices and rights may be available to you under applicable data protection laws, including the right to request access to your personal information or to request to have your personal information deleted. If you have questions about what rights may apply to you, please contact us at [compliance@elionpartners.com](mailto:compliance@elionpartners.com).

***Do Not Track:*** Our Site and Portal do not track the locations of users that access the Site and Portal. However, our Site and Portal do utilize third-party application programming interfaces controlled by third parties, such as to display maps and graphs, that may attempt to track your activity across other sites that utilize those interfaces.

***“Shine the Light” and “Eraser” Laws:*** Residents of the State of California may request a list of all third parties to which we have disclosed certain information during the preceding year for those third parties’ direct marketing purposes.

***For California Residents:***

The CCPA provides California residents and/or their authorized agents with specific rights regarding the collection and storage of their personal information.

*Your Right to Know:* California residents have the right to request that we disclose the following information to you about our collection and use of your personal information over the past twelve (12) months. We may ask you to provide certain information to identify yourself so that we may compare it with our records in order to verify your request. Upon verification, we will disclose to you:

1. The categories of personal information we have collected about you.
2. The categories of sources for the personal information we have collected about you.
3. The specific pieces of personal information we have collected about you.
4. Our business or commercial purpose for collecting or selling your personal information.
5. The categories of third parties to whom we have sold or shared your personal information, if any, and the categories of personal information that we have shared with each third-party recipient.

*Your Right to Opt-Out of Sale:* California residents have the right to opt-out of the sale of their personal information by contacting the business. Please note we do not sell your personal information. We do not knowingly sell the personal information of any individuals under the age of 16.

*Your Right to Delete:* California residents have the right to request that we delete any of the personal information collected from you and retained by us, subject to certain exceptions. We may ask you to provide certain information to identify yourself so that we may compare it with our records in order to

verify your request. Once your request is verified and we have determined that we are required to delete the requested personal information in accordance with the CCPA, we will delete, and direct our third-party service providers to delete, your personal information from their records. Your request to delete personal information that we have collected may be denied if we conclude it is necessary for us to retain such personal information under one or more of the exceptions listed in the CCPA.

*Non-Discrimination:* You will not receive any discriminatory treatment by us for the exercise of your privacy rights conferred by the CCPA.

*Verifying Your Request:* Only you, or a person that you authorize to act on your behalf, may make a request related to your personal information. In the case of access and deletion, your request must be verifiable before we can fulfill such request. Verifying your request will require you to provide sufficient information for us to reasonably verify that you are the person about whom we collected personal information or a person authorized to act on your behalf. We will only use the personal information that you have provided in a verifiable request in order to verify your request. We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority. Please note that we may charge a reasonable fee or refuse to act on a request if such request is excessive, repetitive or manifestly unfounded.

**Jurisdiction.** Information collected through the Site and/or the Portal will be stored in, processed in and subject to the laws of the United States, which may not provide the same level of 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, storage in and processing within the United States.

**Third-Party Links.** We may provide links to other sites or resources provided by third parties. These links are provided for your convenience only. We have no control over the contents of those sites or resources and accept no responsibility for them or for any loss or damage that may arise from your use of them. If you decide to access any third-party links, you do so entirely at your own risk and subject to the terms and conditions of those sites.

**Children.** We do not knowingly collect personal information from children under the age of 13 through our Site or Portal. If you are under 13, please do not give us any personal information. We encourage parents and legal guardians to monitor their children's internet usage and to help enforce our Privacy Policy by instructing their children never to provide us personal information. If you have reason to believe that a child under the age of 13 has provided personal information to us, please contact us and we will endeavor to delete that personal information from our systems.

**Amendments to this Privacy Policy.** This Privacy Policy is effective as of the date stated at the top of this Privacy Policy. We may change this Privacy Policy from time to time. By accessing and using the Service after we notify you of such changes, you are deemed to have accepted such changes. Please refer back to this Privacy Policy on a regular basis.

**How to Contact Us.** If you have any questions regarding this Privacy Policy or our privacy practices, please contact us at [compliance@elionpartners.com](mailto:compliance@elionpartners.com).

You may also write to us at the following address:

Elion Partners  
3323 NE 163rd Street  
Suite 600  
Miami, Florida 33160