

Online Privacy Notice

Updated: August 24, 2020

We at Valedor Partners, LLC, including our affiliates, respect your concerns about privacy. References in the Online Privacy Notice to “we,” “us,” “our,” and “Valedor” are references to the relevant Valedor entity that is responsible for the processing of your Personal Data, which such entity may be contacted through Valedor Partners, LLC via the contact information provided below.

This Online Privacy Notice describes how we process the Personal Data (as defined below) that we collect on valedorpartners.com and other websites or applications that may link to this Online Privacy Notice (the “Sites”); where you visit our premises; where you are a contact at one of our suppliers or other business partners; and through other data collection points or notices that refer to this Online Privacy Notice.

We provide information on the types of Personal Data we collect, how we use the information, with whom we may share it, and the choices available to you regarding our use of the information. We also describe the measures we take to protect the security of the information and how you can contact us about our privacy practices.

“Personal Data” is any information that relates to, describes, identifies, or can be used, directly or indirectly, to identify an individual, such as name, address, date of birth, personal identification numbers, sensitive personal information, and economic information.

Information That You Give us

The types of information we collect concerning individuals includes:

1. business and personal contact information (such as name, postal and email addresses, and telephone number);
2. other information you provide to us (such as information provided by registering for email alerts, filling in forms, and online registration details); and
3. information we may need in order to identify you and complete necessary security checks, for example where you visit one of our offices (such as a form of ID or your image for closed-circuit television (“CCTV”) purposes).

In connection with a job inquiry or application processed through our website, which functionality we may in future establish, you may come to provide: information regarding your work authorization status, education history, current or past job/employment history, and professional designations; performance evaluations; and other information about your background and qualifications. You may also provide information regarding your political contributions for the last two years for legal and compliance purposes, so long as you are not based in the European Union (“EU”). In addition, where legally permissible, you may provide

information regarding your gender, race/ethnicity, and your veteran and disability status. We will not consider either this information or your choice to decline to provide it in evaluating your qualifications for employment with us. This information will be used only for Equal Employment Opportunity reporting and other legal and compliance purposes.

In connection with any investor portal we create, you may come to provide: login credentials; financial information (such as banking information and an account number); taxpayer ID number; jurisdiction of tax residence; date of birth; and certain investment-related information. Please see our separate Privacy Notices as applicable for detailed information as to how we use your Personal Data.

Depending on the nature of our relationship with you, in the past 12 months we may have collected Personal Data concerning you in the following categories:

1. Identifiers (e.g., real name, postal address, email address, government ID, financial information);
2. Sensitive/protected characteristic information (e.g., age, race, citizenship, gender);
3. Commercial information (e.g., products or services purchased, obtained, or considered, personal information disclosed in a sale or acquisition process);
4. Internet or other network activity (e.g. browsing or search history, information regarding interaction with an internet website, application, or advertisement);
5. Geolocation data (e.g., physical location);
6. Professional or employment-related information (e.g., job history, performance evaluations);
7. Non-public education information (e.g., education records); and
8. Inferences drawn from other personal information (e.g., profiles reflecting preferences and trends).

Other Information

In connection with electronic interactions you have with us or our service providers (including by email, phone, or other forms of electronic communication), we may record and monitor details of those interactions, including their content, to the extent permitted or required by applicable law.

We may also collect some information from other sources, including:

1. if we have a business relationship with the organization that you represent, your colleagues or other business contacts may give us information about you such as your contact details or details of your role in the relationship; and
2. information from third-party data providers or publicly available sources for anti-money laundering, background checking, and similar purposes, and to protect our business and comply with our legal and regulatory obligations.

If you provide information to us about another person, you should ensure that you comply with any legal obligations that may apply to your provision of the information to us.

Information We Obtain by Automated Means

When you visit our Sites or open our emails, we may collect certain information by automated means (such as by cookies, web server logs, web beacons, and JavaScript). The information we collect in this manner may include your IP address, network location, browser characteristics, device characteristics, operating system, referring URLs, information on actions taken on our Sites, and dates and times of website visits. Cookies are files that websites send to your computer or other Internet-connected device to uniquely identify your browser or to store information or settings on your device. We also may use these and similar technology in emails we send you to collect certain information, such as whether you opened or clicked on links in our email. Please see our Cookie Notice below.

Our Sites may use cookies (such as HTTP, HTML5, and Flash cookies) as well as other types of local storage (such as browser-based or plugin-based local storage). Some of these cookies may be placed by third parties, such as our service providers. Your browser may tell you how to be notified when you receive certain types of cookies and how to restrict or disable certain cookies. You also may be able to delete your Flash cookies or adjust your Flash cookie settings by visiting the Adobe Flash Website Storage Settings Panel and Global Storage Settings Panel. Please note, however, that without cookies you may not be able to use all of the features of our Sites or other websites and online services.

In conjunction with gathering information through cookies, our web servers may log information such as your device type, operating system type, browser type, domain, and other system settings, as well as the language your system uses and the country and time zone in which your device is located. We also may record information such as the address of the web page that referred you to our Sites and the IP address of the device you used to connect to our Sites. We may log information about your interaction with the Sites, such as which pages you visit. To control which web servers collect information by automated means, we may place tags on our web pages called “web beacons,” which are small files that link web pages to particular web servers and their cookies. We also may send instructions to your device using JavaScript or other computer languages to gather the sorts of information described above and other details about your interactions with the Sites.

We may use third-party web analytics services on our Sites, such as those of Google Analytics. These service providers can help us analyze how visitors use the Sites. The information obtained for this purpose (including your IP address and other information collected by automated means) may be disclosed to or collected directly by these service providers. To learn about opting out of Google Analytics, please [click here](#).

Providers of third-party plugins and widgets may be used on our Sites, such as embedded videos and social media sharing tools, and these may use automated means to collect information

regarding your use of the Sites and your interactions with the plugins and widgets. This information is subject to the privacy policies or notices of the providers of the plugins and widgets.

How We Use the Information We Obtain

We may use, disclose, or otherwise handle the information described in this Online Privacy Notice for the following purposes to:

- operate, evaluate, develop, promote, and improve our business (including developing new products and services; enhancing, improving, and analyzing our products and services; managing our communications; managing our premises; and performing accounting, auditing, and other internal functions);
- create and manage accounts you have with us;
- manage your investments;
- comply with and enforce applicable legal requirements, relevant industry standards, and our policies, including our Terms of Use;
- protect against, identify, and prevent fraud, money-laundering, breach of confidence, cyber attack, theft of proprietary materials, financial or business crimes, and other unlawful activity;
- in some cases, in order to operate, administer, and improve the user's experience of the Sites;
- provide our products and services to you, such as market commentary;
- send you (or produce) promotional materials, newsletters, and other communications, including in visual and audio form (such as videos, podcasts, and online seminars);
- communicate with you about, and administer your participation in, special events, programs, promotions, offers, surveys, and market research;
- respond to your inquiries;
- manage your employment application, assess your qualifications, and manage your employment with us;
- verify your information;
- perform data analyses (including market and consumer research, demographic analyses, and anonymization and aggregation of information);
- operate, schedule, and facilitate online meetings, webinars, and (video) conferences (for example, using Zoom and other online meeting platforms); and
- record audio and video content (for example, of our in-person or online events, training, and meetings where permitted by, and collected in accordance with, applicable data protection law).

In addition, we may use information collected through cookies, web beacons, web server logs, and other automated means for purposes such as (i) customizing our users' visits to our Sites, (ii) delivering content tailored to our users' interests and the manner in which our users browse our Sites, and (iii) managing our Sites and other aspects of our business.

CCTV may operate in some of our buildings for security and safety purposes, in accordance with applicable data protection law. Where CCTV is not operated by us, the CCTV will be under the control of the relevant building landlord, manager, or operator.

We may also use the information in other ways for which we provide specific notice at the time of collection.

We will only process your Personal Data as necessary so that we can pursue the purposes described above. Where we process your Personal Data for our legitimate interests as a business or those of a third party, we do so only where we have concluded that our processing does not prejudice you or your privacy in a way that would override our legitimate interest in pursuing those purposes.

When we collect Personal Data from you, unless indicated otherwise, if we ask you for information, we need it for our business or compliance purposes. In limited circumstances, we are required to collect Personal Data to comply with a legal obligation and/or might ask you to provide information which is purely voluntary; in either case, this will be indicated to you.

If you are a former employee, worker, contractor, or member of Valedor, we will continue to process your Personal Data for a reasonable period following the end of your employment or engagement for our legitimate business and/or our legal compliance purposes and/or for the establishment or defense of a legal claim. Further, in some instances, we may process your data to perform our obligations under the contract between us (e.g., to pay you your final salary payment after your termination date). We only carry out such processing where we have concluded that our processing does not prejudice you or your privacy in a way that would override our legitimate interest in pursuing those purposes. Your data will be retained and deleted in accordance with our retention policies and procedures (as discussed further below).

Online Tracking and Interest-Based Advertising

We and third parties acting on our behalf (such as Facebook, Twitter and LinkedIn) may collect information about your online activities over time and across third-party websites to provide you with advertising about products and services tailored to your interests. Where required by applicable law, we will obtain your consent for the processing of your Personal Data for direct marketing purposes. If you do receive direct marketing communications from us (for example, by post, email, fax or telephone), you may opt-out by clicking the link in the relevant communication, completing the forms provided to you (where relevant), or by emailing us.

We may place ads on other websites or mobile apps if we participate in advertising networks. Ad networks allow us to target our messaging to users by considering demographic data, users' inferred interests, and browsing context. These networks track users' online activities over time by collecting information through automated means (such as by cookies, web server logs, web beacons, and other similar technologies). The networks use this information to show ads that may be tailored to individuals' interests, to track users' browsers or devices across multiple

websites or apps, and to build a profile of users' online browsing activities. The information ad networks may collect includes data about users' visits to websites and apps that participate in the relevant ad networks, such as the pages or ads viewed and the actions taken on the websites or apps. This data collection would take place both on our Sites and on third-party websites and apps that participate in the ad networks, and can help advertisers track the effectiveness of marketing efforts.

To learn how to opt out of ad network interest-based advertising, please visit www.aboutads.info/choices, <http://www.networkadvertising.org/choices/>, or <http://www.youronlinechoices.eu/>.

Information We Disclose to Others

We do not disclose Personal Data we obtain about you through the Sites or other channels covered by this Online Privacy Notice, except as described in this Online Privacy Notice. We may share your Personal Data with our affiliates and subsidiaries. Depending on the nature of our relationship with you, we also share Personal Data with service providers who perform services on our behalf, our financial and transaction counterparties, our professional advisors, and your agents and representatives. We do not authorize these persons to use or disclose the information except as necessary for the purposes for which it is provided or to comply with legal requirements.

We also may disclose information about you (i) if we are required to do so by law or legal process, (ii) to law enforcement authorities, regulators, and/or other government entities and/or other competent authorities based on a lawful disclosure request, or (iii) when we believe disclosure is necessary or appropriate to prevent harm or financial loss, or in connection with an investigation of suspected or actual fraudulent or illegal activity. We reserve the right to transfer Personal Data we have about you in the event that we sell or transfer all or a portion of our business or assets (including in the event of a reorganization, spin-off, dissolution, or liquidation).

In addition, we may share anonymous/aggregated information with third parties, such as service providers, in order to facilitate our business operations.

Information (if any) collected through third-party plug-ins and widgets on our Sites (such as information relating to your use of a social media sharing tool) is collected directly by the providers of the plug-ins and widgets. This information is subject to the privacy policies of the providers of the plug-ins and widgets, and Valedor is not responsible for those providers' information practices.

For California Residents, in the preceding 12 months, we may have disclosed Personal Data listed in any of the categories in the "Information We Obtain" section above for business purposes (in particular, as described in this section).

We have not sold Personal Data in the 12 months preceding the date of this Online Privacy Notice.

Data Transfers

We may transfer the Personal Data we collect about you to recipients in countries other than the country in which the information was originally collected. Where you are based in the UK (after it has left the EU), the EU, or another country which imposes data transfer restrictions outside of its territory, this includes transfers outside of the UK and the European Economic Area (“EEA”) or that geographical area, including to those countries in which our affiliates, group members, service providers, and business partners operate. Those countries may not have the same data protection laws as the country in which you initially provided the information. Where we transfer Personal Data outside of the UK, the EEA, or other territories subject to data transfer restrictions to other members of Valedor or our service providers, we will ensure that our arrangements with them are governed by data transfer agreements or safeguards, designed to ensure that your Personal Data is protected as required under applicable data protection law (including, where appropriate, under an agreement on terms approved for this purpose by the European Commission or by obtaining your consent).

Retention and Deletion of Your Information

We intend to keep your Personal Data accurate and up-to-date. We will delete the information that we hold about you when we no longer need it. We retain your Personal Data for as long as it is required by us for our legitimate purposes, to perform our contractual obligations, or where longer, such longer period as is required or permitted by law or regulatory obligations which apply to us.

We will retain your information in line with our retention policies and, in any event, for no longer than is necessary given the purpose for which it was collected.

Note that we may retain some limited information about you (even when we know that you have left the organization that you represent) so that we can maintain a continuous relationship with you if and when we are in contact with you again.

Your Rights and Choices

We offer you certain choices in connection with the Personal Data we collect from you. To update your preferences or submit a request, please contact us as indicated in the “How to Contact Us” section of this Online Privacy Notice. To the extent provided by the law of your jurisdiction or otherwise applicable to our processing of your information, you may request access to the Personal Data we maintain about you or request that we correct, amend, delete, or block the information by contacting us as indicated below. Where provided by law, you may withdraw any consent you previously provided to us or object at any time on legitimate grounds to the processing of your Personal Data, and we will apply your preferences going forward. You can also lodge a complaint about our processing of your Personal Data with the body regulating data protection in your country.

These rights, subject to certain limitations, may include:

- **Rights of access, correction, and deletion.** You may have a right of access to the Personal Data that we hold about you, and to some related information, including the purpose for processing the Personal Data, the categories of recipients of that Personal Data to the extent it has been transferred internationally, and, where the Personal Data has not been collated directly from you, the source (the “Category Information”). You may also have the right to require any inaccurate Personal Data to be corrected or deleted.
- **Right to object and portability.** You can object to our use of your Personal Data for direct marketing purposes at any time and you may have the right to object to our processing of some or all of your Personal Data (and require it to be deleted) in some other circumstances. In some circumstances, you may also have a “data portability” right to require us to transfer your personal data to you or a third party, in a data portable format.
- **Complaints.** You can also lodge a complaint about our processing of your Personal Data with the body regulating data protection in your country.

California residents may also request certain information about our disclosure of Personal Data during the prior year, including category information (as defined above).

We review and verify requests to protect your Personal Data, and will action data protection requests fairly and in accordance with applicable data protection laws and principles.

If you wish to exercise any of these rights, please contact us as set out below.

How We Protect Personal Data

We maintain administrative, technical, and physical safeguards designed to protect Personal Data we obtain through the Sites against accidental, unlawful, or unauthorized destruction, loss, alteration, access, disclosure, or use.

Links to Other Websites

Our Sites may provide links to other websites for your convenience and information. These websites may operate independently from us. Linked websites may have their own privacy notices or policies, which we strongly suggest you review. To the extent any linked websites are not owned or controlled by us, we are not responsible for their content, any use of the websites, or the privacy practices of the websites.

Updates to Our Online Privacy Notice

This Online Privacy Notice may be updated periodically and without prior notice to you to reflect changes in our Personal Data practices. Please check for any updates regularly.

How to Contact Us

If you have any questions or comments about this Online Privacy Notice, or if you would like us to update information we have about you or your preferences, please email us or access our web form at info@valedorpartners.com.

You also may write to:

Valedor Partners, LLC
4265 San Felipe Street
Suite 970
Houston, TX 77027

Please also contact us via any of the above methods if you have a disability and require an alternative format of this Online Privacy Notice.

Cookie Notice

What are cookies?

A “cookie” is a text file that websites send to a visitor’s computer or other Internet-connected device to uniquely identify the visitor’s browser or to store information or settings on the device. Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognizes that cookie. Cookies are useful because they allow a website to recognize a visitor’s device and to target the content displayed to the visitor’s interests.

Do we use cookies on the Sites and, if so, why?

Yes. By using our website you agree that, unless you have set your computer’s browser to reject them, we can place the types of cookies set out in the table below on your device, and use that data in accordance with this policy.

We use cookies (including HTTP, HTML5 and Flash cookies) and similar technologies (such as web beacons and JavaScript) to (i) customize and improve the users’ visits to our Sites, (ii) deliver content tailored to the users’ interests and the manner in which they browse our Sites, and (iii) manage our Sites and other aspects of our business.

What types of cookies are used on the Sites and what choices do you have?

Below is a list of the cookies that we would like to use on our Sites. You can indicate your acceptance of all cookies or a selection of cookies that you allow us to use on our Sites. Please note that depending on your selection, you may not be able to take full advantage of the Sites. Please also understand that a cookie will be placed on your device to allow us to remember the selection you make.

Cookie Type	Description
Strictly Necessary Cookies	These cookies are necessary for the Sites to work, and enable you to move around the Sites and use their services and features. Disabling these cookies will encumber the Sites’ performance and may make these services and features unavailable. Strictly necessary cookies are used to collect session ID and authentication data. These are session cookies, which expire when you close your browser session.
Functional Cookies	Functional cookies allow the Sites to help maintain your session and remember the choices you have made in order to provide functionality for your benefit. Functional cookies are used to collect information about your language preferences and other preferences indicated during your visit to the Sites. For example, functional “session” cookies allow the Sites to remember settings specific to you, such as your country selection, which ultimately improves your web experience. Functional cookies also include persistent cookies which are used to remember your preferences when you subsequently visit our Sites. Functional “persistent” cookies expire after seven days.
Analytic Cookies	Analytic cookies are used to gather statistics about the use of the Sites in order to improve the performance and design of the Sites and our services. For these purposes, analytic cookies collect information about your device type, operating system type, browser type, domain, other system settings, IP address, referring URLs, information on actions taken on the Sites, and the dates and times of your visits, as well as the country and time zone in which your device is located. These cookies are provided by third-party analytics tool providers (e.g., Google Analytics) and the information obtained through these cookies will be disclosed to, or collected directly by, such third-party service providers.
Third-party Cookies	We may partner with third parties to provide you with connections to certain social networks (such as Facebook, Twitter, and LinkedIn) and to provide you with additional features (such as YouTube and Vimeo). By using the Sites or engaging with third-party plugins and widgets on our Sites, such third parties may place session or persistent cookies, or similar technologies, on your browser. These technologies may provide the third parties information about your visit so that they can present you with advertisements for Valedor products and services which may be of interest to you. The use of these cookies would be subject to such third parties’ own cookie policies.

How do I disable or remove cookies?

You can restrict, or otherwise change, the use of cookies on the Sites through your browser. Each type of browser offers ways to restrict and delete cookies. For more information on how to manage cookies through your browser, please review your browser's security settings. Furthermore, you can delete Flash cookies or adjust your Flash cookie settings by visiting the Adobe Flash Website Storage Settings Panel and Global Storage Settings Panel.