

## **GUARD STREET PARTNERS, LLC TERMS & CONDITIONS**

### **OUR WEBSITE**

Every effort is made to ensure that the information on this website is regularly checked and kept up to date. However, no liability can be held for the completeness, actuality and accuracy of the information within these pages. The access to and use of the website as well as all information contained or referred to therein lies in the sole responsibility of the user. The contents of linked pages are not a component of this website. No responsibility or liability can be held for the contents or changes to contents of linked pages.

The use of any part of the contents of this website, in particular its reproduction, distribution or transmission, requires the prior permission of Guard Street Partners, LLC.

### **PRIVACY POLICY**

Our Privacy Policy explains how we protect and respect the data we collect from you. Your use of this site constitutes acceptance of this policy.

### **DISCLAIMER**

Copyright© 2019 Guard Street Partners, LLC. All rights reserved.

No part of this publication may be reproduced or transmitted by any means, electronic, mechanical, (including photocopying), recording or by any information storage and retrieval system, without prior permission from the copyright owners.

Guard Street Partners, LLC disclaims all responsibility and liability (including negligence) in relation to information on or accessible from this site.

### **YOUR AGREEMENT**

The use of our website constitutes your agreement with these terms of use.

### **POLICY CHANGES**

If our terms of use change in any way, we will place an updated version on this page. Regularly reviewing this page ensures you are always aware of what information we collect, how we use it and under what circumstances, if any, we will share it with other parties.

### **INFORMATION SECURITY POLICY**

The policy of the company is on a continuing basis to exercise due care and due diligence to protect information systems from leakage, unauthorized access, use, disclosure, destruction, modification, disruption or distribution.

This will ensure that the Company's reputation with our clients is maintained through confidentiality, integrity and availability.

We will ensure business, legal, regulatory requirements and contractual security obligations are taken into account.

We bear the responsibility for establishing and maintaining the system and undertakes to ensure its integrity is maintained through instruction and training of its personnel and that each employee has a proper understanding of what is required of them.

This will in part be done by continuous vulnerability management which involves the scanning of hosts for outdated software and the immediate updating of systems which are deemed outdated.

Equally every employee has a personal responsibility to maintain this integrity. To support this, employees are required to send any security concerns or issues to any of the members of our IT Administration Team.

Further, we will ensure any sub-contractor employed for a particular function will meet the requirements specified and accept responsibility for their actions.

The Company has a policy of continuous improvement and objective setting in line with ISO 27001:2005 Standard.

The Information Security Management System will be monitored regularly under the Executive Leadership's ultimate responsibility with regular reporting of the status and effectiveness at all levels.

#### **QUALITY POLICY**

The continuing policy of Guard Street Partners, LLC is to provide a professional and efficient service to meet all of the agreed requirements of our customers. This achievement will result in securing efficiency and the enhancement of long-term profitability.

We bear the responsibility for establishing, maintaining and implementing the system for controlling those particular activities for which they are responsible. We undertake to ensure through instruction, practical example and training that quality is the aim of all members of the Company and that each employee has a proper understanding of the importance of the Quality System function and its direct relevance to the success of the Company.

Equally every employee is responsible for, and will be trained to perform the duties required by his or her specific role. Furthermore the Company will ensure that any subcontractors employed for a particular function will meet specified requirements and will accept the responsibility for their work.

Last Updated January 1, 2018

## GUARD STREET PARTNERS, LLC PRIVACY POLICY

Guard Street Partners, LLC is very sensitive to privacy issues on the Internet. We believe it is important that you understand how we treat the information you may provide to us. Unless specifically stated otherwise, the information you provide is never shared with anyone other than Guard Street Partners employees or authorized contractors.

This Privacy Policy applies to Guard Street Partners' corporate web site, [www.guardstreet.com](http://www.guardstreet.com). Guard Street Partners also adheres to the privacy policies of its clients in the event it collects, stores and/or transmits data as part of the services that it provides to such clients. We encourage you to read this and all privacy policies carefully so that you understand what information is collected from you and how that information is or may be used. Your use of the Guard Street Partners site constitutes your express acknowledgment of and agreement to the terms, disclaimers and conditions of use contained within this site and in this Privacy Policy.

### Information Collection and Use

Guard Street Partners collects and stores the information you provide to us through use of our web site. For example, you provide information to Guard Street Partners through registration or submission of other forms. Information collected and stored may include personal information such as your name, the company for which you work, postal address, email address, telephone number and/or other information. We may also collect user names and passwords, as necessary to host and support client's web sites.

Additionally, we automatically collect certain information from your computer in the form of log files or cookies.

### Log Files

As is true of most web sites, we gather certain information automatically and store it in log files. This information may include Internet Protocol (IP) addresses, browser type, referring/exit pages, operating system, date/time stamp, and clickstream data. This information may be collected from the Guard Street Partners site as well as web sites that Guard Street Partners hosts on behalf of its clients. We use this information to analyze trends, to administer the site, and to track how visitors interact with the Guard Street Partners web site.

### Cookies

A cookie is a small text file that is stored on a users computer for record-keeping purposes. We do use cookies on our site. Guard Street Partners may use both session ID cookies and persistent cookies. We use session cookies to make it easier for you to navigate our site. A session 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 browsers help file.

If you reject cookies, you may still use our site, but your ability to use some areas of our site, such as contests or surveys, will be limited and you may need to reenter personal information when you register for events.

### **Social Media Features**

Our web site includes Social Media features, such as the Facebook and Twitter button, which may collect your IP address and information concerning which page you are visiting on our site and may set a cookie to enable the Social Media feature to function properly. Social Media features are either hosted by a third party or hosted directly on our site, and your interactions with these Social Media features are governed by the privacy policy of the company providing the Social Media feature, such as Facebook or Twitter.

### **How We Protect Your Personal Information**

Guard Street Partners safeguards the security of the data you send us with physical, electronic, and managerial procedures. The Guard Street Partners web site, as well as web sites that we host on behalf of our clients, use SSL encryption on all web pages where personal information is submitted. This protects the confidentiality of your personal and credit card information as it is transmitted over the Internet.

However, no method of transmission over the Internet or method of electronic storage is absolutely secure; therefore, we cannot 100% guarantee the security of your data. We urge you to take every precaution to protect your personal data when you are on the Internet. Change your passwords often, use a combination of letters, numbers and symbols, and make sure you use a secure browser.

Guard Street Partners may employ contractors to help manage data services, and such contractors may have access to data, similar to the access we give our employees. We require that our contractors apply similar standards to protect the security and confidentiality of any data shared.

### **Sharing**

We may provide your personal information to companies that provide services to Guard Street Partners, which assist us with our business activities. These companies are given access to and are authorized to use your personal information only as necessary to provide these services to us. Your personal information will only be shared with such companies as described in this privacy statement. Additionally, we require that any service provider with which we share data applies standards equivalent to those used by Guard Street Partners to protect the security and confidentiality of any data shared.

We may also disclose your personal information (i) as required by law (ie. to comply with a subpoena, a government request or other legal process); (ii) when, in our good faith belief, disclosure is necessary to protect our rights, your safety or that of others, or to investigate fraud; (iii) to any other third party, once you have given prior consent; or (iv) in the event of a merger, acquisition, or sale of all or a portion of Guard Street Partners' assets (a "Change in Control"). In the case of a Change in Control, we would notify you via email and/or a notice on our site of any change in the ownership or use of your personal information.

#### **Data Retention**

Guard Street Partners may retain any data collected and stored on behalf of our clients for as long as necessary to provide services to you and our Clients, as well as to comply with our legal obligations, resolve disputes, and enforce our agreements.

#### **Participation in Guard Street Partners' Blogs or Other Online Forums**

Our web site may provide you with the opportunity to respond to blog postings or to participate in other online forums. If any content is contributed by you to a blog or other online forum, you will retain your rights to the content that you post; however, your contribution automatically constitutes consent to grant Guard Street Partners a worldwide, non-exclusive, royalty-free license, including the right to sub-license, to use, copy, reproduce, transmit, publish, modify, display and distribute such content for any purpose and through any media or distribution channel or method.

Any content you post to on the Guard Street Partners site may be publically viewed and used by anyone on the Internet. Therefore, please safeguard your privacy by not posting or submitting personal information in any public forum.

Guard Street Partners has the absolute right and discretion to pre-screen, reject, modify, adapt or remove any content that you post. You are responsible for any and all content that you post on the Guard Street Partners site, including any consequences thereof, such as the use of your content by

other users. You agree not to post any content that (i) is unlawful, harmful, threatening, abusive, harassing, tortious, defamatory, vulgar, obscene, libelous, invasive of another's privacy, hateful, or racially, ethnically or otherwise objectionable; (ii) you do not have a right to transmit, publish or make publically known under any law or under contractual or fiduciary relationships; (iii) infringes any patent, trademark, trade secret, copyright or other proprietary rights of any party; or (iv) contains software viruses or any other computer code, files or programs designed to interrupt, destroy or limit the functionality of any computer software or hardware or telecommunications equipment.

Guard Street Partners does not control the content posted by public users to our site and makes no guarantees as to the accuracy, integrity or quality of such content. Therefore, Guard Street Partners shall not, under any circumstances, be liable for any user-contributed content, including, but not limited to, any errors or omissions in any content, or any loss or damage of any kind incurred as a result of the use of any user-contributed content.

### **Corporate Anti-Spam Policy**

Guard Street Partners adheres to the CAN-SPAM Act. If you wish to no longer receive emails from us or feel that you have received unsolicited email from us, please follow the unsubscribe instructions included in the unwanted email received or contact us at [privacy@guardstreet.com](mailto:privacy@guardstreet.com) and attach the unsolicited email for reference.

### **Links To Other Sites**

The Guard Street Partners web site may contain links to other sites that are not owned or controlled by Guard Street Partners. Please be aware that Guard Street Partners is not responsible for the privacy practices of such other sites. We encourage you to be aware when you leave our site and to read the privacy statements of each and every web site that collects personally identifiable information.

### **Information Obtained From Third Parties**

Guard Street Partners does not sell or trade your personal information. We may at times receive contact lists from other organizations. We may send mailings such as brochures to these addresses. Typically, these are one-time mailings, and the data is not entered into our database. If you want to remove yourself from the third party's database, you must contact them directly. These mailings have a brochure code printed on the mailing label. By providing this code, we will be able to tell you from what provider we received your contact info.

### **Changes To This Privacy Statement**

We reserve the right to modify this privacy statement at any time, so please review it frequently. If we decide to change our Privacy Policy, we will post those changes to this privacy statement on our web site or 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. You can determine when this Privacy Policy was last revised by checking the “Last Updated” legend at the bottom of this Privacy Policy.

### **Contact Us**

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

Last Update: January 24, 2018