

# PRIVACY POLICY

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Investment Management Support Solutions LLC, including affiliates (“**IMSS**”, “**Company**”, “**us**”, “**we**”, or “**our**”) respects your privacy. When you visit element.io (the “**Site**”) and / or sign in through the Data-Centrix™ Manager Portal (the “**Registered Account**” or “**Portal**”), IMSS collects certain information about you in order to create a Registered Account, provide services as defined in your Service Agreement (“**Services**”), learn more about who uses the Site and to make improvements to benefit Site visitors, IMSS Customers and Registered Users (the “**Experience**”). To learn what information IMSS collects, what IMSS does with that information, and your options regarding this information, please read the IMSS Privacy Policy below.

We use your data to provide Services and improve the Experience. By using the Service, you agree to the collection and use of information in accordance with this policy as well as agreeing to our Terms and Conditions [https://imss-documents.s3.amazonaws.com/imss\\_terms\\_of\\_use.pdf](https://imss-documents.s3.amazonaws.com/imss_terms_of_use.pdf). Unless otherwise defined in this Privacy Policy, terms used in this Privacy Policy have the same meanings as in our Terms and Conditions, accessible from [www.imss-llc.com](http://www.imss-llc.com).

## Definitions

### **Cookies**

Cookies are small pieces of data stored on your device (computer or mobile device).

### **Client**

The Client is the registrant of the Master Account pursuant to a Service Agreement.

### **Data Controller**

Data Controller means the natural or legal person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal information are, or are to be, processed.

For the purpose of this Privacy Policy, we are a Data Controller of your Personal Data.

### **Data Processors (or Service Providers)**

Data Processor (or Service Provider) means any natural or legal person who processes the data on behalf of the Data Controller.

We may use the services of various Service Providers in order to process your data more effectively.

### **Data Subject (or User)**

Data Subject is any living individual who is using our Service and is the subject of Personal Data.

### **Master Account**

The Master Account is the primary account of the Client subscribing for the Services, accessed and managed by the Client’s appointed Primary Contact(s).

**Personal Data**

Personal Data means data about a living individual who can be identified from those data (or from those and other information either in our possession or likely to come into our possession).

**Primary Contact**

Person(s) who are elected to serve as administrator(s) by the Client and manage the Master Account.

**Primary User**

Registered User who will provide all data updates to the Portal.

**Registered Users**

Users who are given access to the Services including Primary Contact(s).

**Services**

Services provided by IMSS to Client as agreed upon in a separate **Service Agreement** incorporated by reference.

**Usage Data**

Usage Data is data collected automatically either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).

**User Account**

Client shall grant access to selected users to create individual accounts to utilize the Services.

**Information Collection and Use**

We collect several different types of information for various purposes to provide and improve our Service to you.

**Personal Data Collected**

While using our Service, you will be asked to provide certain information about the Client, and certain personally identifiable information that can be used to contact or identify you ("Personal Data"). Personally identifiable information may include, but is not limited to:

- First name and last name
- Firm Email address
- Firm Phone number
- Firm Address, State, Province, ZIP/Postal code, City
- Professional information
- Company information
- Employment information
- Cookies and Usage Data
- Documents
- Announcements
- Financial Reports

- Firm Reports

We may use your Personal Data to create your account or contact you with newsletters, marketing or promotional materials and other information that may be of interest to you. You may opt out of receiving any, or all, of these communications from us by following the unsubscribe link.

### **Master Account**

Upon signing a new Service Agreement, the Client will be set-up on the Portal using company information and designated Primary Contact and Primary User to create the Master Account. The Primary User will receive an email with a link to accept an invitation, enter in the additional information, agree to the Terms & Conditions and Privacy Policy, and create a password in the Portal.

### **User Account**

When you create a User Account on the Site, you are asked to provide Personal Data (“Account”). IMSS requests this information to verify your identity and affiliation with Client, confirm contact information, and determine eligibility to access the Services.

### **Services**

IMSS analyzes Client’s data in real-time and sensitive data that may be buried within your integrations. Services are specifically defined in Client’s Service Agreement. In order to utilize Services Clients will upload document(s) on to the platform. IMSS will have access to any documents you upload.

### **Termination**

You can close your IMSS account with thirty (30) days prior written notice to IMSS as indicated within your Service Agreement. If you close your account, IMSS may delete all of your account information. It is your responsibility to backup any information prior to your account being terminated. Information that is deleted cannot be recovered.

### **Usage Data**

We may also collect information about how the Service and / or Experience is accessed and used ("Usage Data"). This Usage Data may include information such as your computer's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Experience that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

### **Tracking Cookies Data**

We use cookies and similar tracking technologies to track the activity on our Service and hold certain information.

Cookies are files with small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyze our Service.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service and/or Experience.

Examples of Cookies we use:

- **Session Cookies.** We use Session Cookies to operate our Service.
- **Preference Cookies.** We use Preference Cookies to remember your preferences and various settings.
- **Security Cookies.** We use Security Cookies for security purposes.

### **Use of Data**

IMSS uses the collected data for various purposes:

- To provide and maintain our Service and Experience
- To notify you about changes to our Service and Experience
- To allow you to participate in interactive features of our Service when you choose to do so
- To provide customer support
- To gather analysis or valuable information so that we can improve our Service and Experience
- To monitor the usage of our Service and Experience
- To detect, prevent and address technical issues
- To provide you with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about unless you have opted not to receive such information

### **Legal Basis for Processing Personal Data Under General Data Protection Regulation (GDPR)**

If you are from the European Economic Area (EEA), IMSS's legal basis for collecting and using the personal information described in this Privacy Policy depends on the Personal Data we collect and the specific context in which we collect it.

IMSS may process your Personal Data because:

- We need to perform a contract with you
- You have given us permission to do so
- The processing is in our legitimate interests and it's not overridden by your rights
- For payment processing purposes
- To comply with the law

### **Retention of Data**

IMSS will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to

comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

IMSS will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer time periods.

### **Transfer of Data**

Your information, including Personal Data, may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

If you are located outside United States and choose to provide information to us, please note that we transfer the data, including Personal Data, to United States and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

IMSS will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

### **Disclosure of Data**

#### **Disclosure for Law Enforcement**

Under certain circumstances, IMSS may be required to disclose your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

#### **Legal Requirements**

IMSS may disclose your Personal Data in the good faith belief that such action is necessary to:

- To comply with a legal obligation
- To protect and defend the rights or property of IMSS
- To prevent or investigate possible wrongdoing in connection with the Service or Experience
- To protect the personal safety of users of the Service or the public
- To protect against legal liability

#### **Security of Data**

The security of your data is important to us but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use

commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

### **"Do Not Track" Signals Under California Online Privacy Protection Act (CalOPPA)**

We do not support Do Not Track ("DNT"). Do Not Track is a preference you can set in your web browser to inform websites that you do not want to be tracked.

You can enable or disable Do Not Track by visiting the Preferences or Settings page of your web browser.

### **Your Data Protection Rights Under General Data Protection Regulation (GDPR)**

If you are a resident of the European Economic Area (EEA), you have certain data protection rights. IMSS aims to take reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Data.

If you wish to be informed what Personal Data we hold about you and if you want it to be removed from our systems, please contact us.

In certain circumstances, you have the following data protection rights:

**The right to access, update or to delete the information we have on you.** Whenever made possible, you can access, update or request deletion of your Personal Data directly within your account settings section. If you are unable to perform these actions yourself, please contact us to assist you.

**The right of rectification.** You have the right to have your information rectified if that information is inaccurate or incomplete.

**The right to object.** You have the right to object to our processing of your Personal Data.

**The right of restriction.** You have the right to request that we restrict the processing of your personal information.

**The right to data portability.** You have the right to be provided with a copy of the information we have on you in a structured, machine-readable and commonly used format.

**The right to withdraw consent.** You also have the right to withdraw your consent at any time where IMSS relied on your consent to process your personal information.

Please note that we may ask you to verify your identity before responding to such requests.

You have the right to complain to a Data Protection Authority about our collection and use of your Personal Data. For more information, please contact your local data protection authority in the European Economic Area (EEA).

## **Service Providers**

We may employ third party companies and individuals to facilitate our Service ("Service Providers"), to provide the Service on our behalf, to perform Service-related services or to assist us in analyzing how our Service is used.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

## **Third-Party Platform Integrations and Hosted Platform**

In providing the Services IMSS has integrated various applications and you will access your account via a Hosted Platform. The Privacy Policy and Terms and Conditions

## **Analytics**

We may use third-party Service Providers to monitor and analyze the use of our Service such as:

### **Amazon Web Services**

For information on the privacy practices of AWS, please visit the AWS Privacy Terms web page: <https://aws.amazon.com/privacy/>

### **Heroku**

For information on the privacy practices of Heroku, please visit the Heroku Privacy Terms web page: <https://www.salesforce.com/company/privacy/>

## **Payments**

We use third-party services for payment processing (e.g. payment processors).

We will not store or collect your payment card details. That information is provided directly to our third-party payment processors whose use of your personal information is governed by their Privacy Policy. These payment processors adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, Mastercard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of payment information.

The payment processor we currently work with is:

### **Quickbooks**

Their Privacy Policy can be viewed at <https://www.intuit.com/privacy/>

We may elect to work with other payment processor and you will be able to locate their privacy policy's on their website.

**Links to Other Sites**

Our Service and Experience may contain links to other sites that are not operated by us. If you click on a third-party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

**Children's Privacy**

Our Service does not address anyone under the age of 18 ("Children"). We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your child has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from Children, we take steps to remove that information from our servers.

**Changes to This Privacy Policy**

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

**Contact Us**

If you have any questions about this Privacy Policy, please contact us:

- By email: [info@imss-llc.com](mailto:info@imss-llc.com)