

Privacy Notice

Effective: June 5, 2020

AEC Advisors, LLC (“AEC”) respects your right to privacy. This Privacy Notice explains how AEC may collect, share, use and process information about you, and how you can exercise your privacy rights. It applies to all individuals who access our website, mobile apps, and in connection with our blogs, alerts, newsletters, webinars, social media sites or programs and other communication services (the “Services”).

If you have any concerns or questions about your privacy or use of our Services, please contact us via email at info@aecadvisors.com or via postal mail at the relevant location listed in the “How to Contact Us” section below.

We may provide supplemental privacy notices on specific occasions when we are collecting or processing personal information about you. Those supplemental notices should be read together with this Privacy Notice.

1. **Amendment of the Privacy Notice.** AEC may update this Privacy Notice from time to time. The effective date of the current Privacy Notice is noted at the top of this page. If AEC makes material changes to the way we collect, use, share or process the personal information that you have provided that adversely impact you, we will notify you by posting a notice of the changes in a clear and conspicuous manner on the AEC website or via the most recent email address we have on file for you.

2. **Information Collected.** When you use our Services, we collect personal information about your use of our Services and information that you send us. Throughout this Privacy Notice, we use the term “personal information,” which generally mean information that identifies you or makes you identifiable, and will have the meaning throughout as defined under the applicable law. Information that has been altered so that it does not identify a specific individual is not “personal information.” We may collect and store the following information when running the Service:

- a. *Information You Provide Voluntarily.* We collect information that you voluntarily provide to us, including: when you communicate via email or other channels; when you sign up for news, publications and marketing communications and events; when you seek career information; when you register for communications newsletters, alerts, or other materials; when you submit an application for a position with us; when you sign up for a webinar or event; when you respond to our communications or requests for information. The information you provide may include your name, contact information, title, and information about the organization with which you are affiliated. In relation to career information, the information you provide may also include employment history and qualifications. We only collect and process the personal information we need to allow us to respond to your request and/or provide the particular service you have sought.
- b. *Information We Collect Automatically.* We may automatically collect information about you when you use our Services such as, but not limited to:
 - i. *Device Information.* We may collect information about devices you use to access the Services and how you use the Services, such as your Internet Protocol (“IP”) address and which websites you visited before accessing our Services.
 - ii. *Performance and Log Data.* Our servers may automatically record information created by your use of our Services, which may include information such as, but not limited to, your IP address, browser type, operating system, command line information, diagnostic information related to the Services (e.g., crash activity reports), the referring web page, pages visited, location, your mobile carrier, device and application IDs, and search terms. For instance, when we send you an email, we may collect certain information including the nature of the email, whether you opened or deleted our email, action you took upon receipt of our email, or your name and contact information.
 - iii. *Cookies.* We use cookies to display information more effectively, store, on a user’s computer or device information about the user’s preferences and settings, gather statistical information about

the use of our Services to improve our design and functionality, and for security purposes. Please review our **Cookie Notice** for more information.

- iv. *DNT*. Please note that we do not currently respond to web browser “do not track” signals or other mechanisms that may allow you to opt out of the collection of information across networks of websites and online services as there is no standard for how online services should respond to such signals. As standards develop, we may develop policies for responding to do-not-track signals that we will describe in this Privacy Notice.
- c. *Information We Receive From Third Parties*. When we receive personal information about you from third parties and use such information, this can include: your name, email address, contact information, the company you work for, your position, business and home address, identification and background information, professional experience and qualifications, previous positions, financial information, such as payment related information and shareholdings, and other personal information. If you connect to us from a social network, such as LinkedIn or Facebook, we will collect personal information from the social network in accordance with your privacy settings on that social network. The connected social network may provide us with information such as your name, profile picture, network, gender, username, user ID, age or age range, language, country, friends list, follower list, and any other information you have agreed it can share or that the social network provides to us. We will assume that such social network or other third parties are entitled to collect and share such personal information with us.
- d. *Sensitive Information*. We may collect sensitive information about you when you use our Services. Any use of such information is limited to the such purposes described to you at the time of collection.

3. **How and Why We Use Your Information.**

- a. *To Provide Our Services to You*. We may process your personal information to inform you about our Services, new developments, relevant information in the industries we serve, and our marketing events. Without your personal information, we cannot provide such Services.
- b. *To Respond to Your Inquiries*. We process your personal information when you contact us, such as with questions, concerns, feedback, disputes or issues. Without your personal information, we cannot respond to you or ensure your continued use and enjoyment of the Services.
- c. *To Ensure the Security of the Service*. We are committed to ensuring your safety and continued enjoyment of our Services. To do so, we process your personal information to: combat spam, malware, malicious activities or security risks; improve and enforce our security measures; and to monitor and verify your identity so that unauthorized users do not access your account with us or your information we otherwise hold. We cannot ensure the security of our Services if we do not process your personal information for security purposes.
- d. *To Personalize Your Experience on the Services*. We may provide you with third-party services, plugins, and many other options to personalize your experience of our Services. In addition, we also use cookies and similar tracking technology for such purposes (please see our **Cookie Notice** for more information). By personalizing the Services, you get to enjoy our Services even more because we keep track of your preferences. Without processing your personal information for such purposes, you may not be able to access or personalize part or all of our Services.
- e. *For Research and Development Purposes*. To continue to provide you with our innovative Services, we collect information about the way you use and interact with our Services for research and development purposes. Research and development help us improve our Services and build new Services and customized features or Services. We take additional security measures when processing your personal information for such purposes, by de-identifying or pseudonymizing your information, limiting access to personnel that may conduct research and development, and applying other technical, physical, and administrative security measures.

- f. *To Engage in Marketing Activities.* We process your personal information to inform you about our Services, new legal and policy developments, relevant information in the industries we serve and our marketing events (including by electronic means, such as email). To do so we may process your contact information or information about your interactions on our Services to send you marketing communications; provide you with information about events, webinars, or other materials; deliver targeted marketing to you (please see our **Cookie Notice** for more information about digital interest-based advertising); and keep you updated about our Services. You can opt-out of receiving our marketing information at any time by clicking an unsubscribe link in our emails.

4. **Information Disclosure.** We do not sell, exchange, transfer, or give your personal information to any other company or individual for any reason except as set forth in this Privacy Notice and as described below:

- a. *Our Service Providers.* We share information with our service providers, suppliers, subcontractors, and similar third parties who provide services to us, or act on our behalf so that they can assist us with the maintenance of our Service. Our contracts with these service providers prohibit them from sharing your personal information with others for other purposes than as directed by us.
- b. *Corporate Reorganization.* We may transfer information to a third party in case of the reorganization, sale, merger, joint venture, assignment, transfer or other disposition of all or any portion of our business, asset or stocks, including in the event of corporate restructuring. We reserve the right, as part of this transaction, to transfer or assign personal information we have collected from you to these third parties. Except as otherwise provided by a bankruptcy or other court, the use and disclosure of all personal information will be subject to policies that are consistent with the policies described in this Privacy Notice. However, any personal information that is submitted or collected after that transfer may be subject to a new privacy policy adopted by the successor entity.
- c. *Law Enforcement Requests.* We may use, share, or disclose information about you in order to address legal concerns or liabilities, especially when we believe, in our sole discretion, that (a) you might have misused the Services, such as to gain unauthorized access to any system, engaged in spamming, denial of service attacks, or similar attack; (b) disclosure is reasonably necessary to enforce our **Terms of Use**; (c) to respond to suspected illegal or fraudulent activity; (d) to protect legal rights or defend against legal claims; (e) to allow us to pursue available remedies or limit the damages that we or a third party may sustain.
- d. *Your Consent.* We will disclose your information to a person you have given us your consent to disclose to or as required to complete the Services.

5. **Contact Us.** You can contact us via email at info@aecadvisors.com

You may also contact us by regular mail at: 1185 Avenue of the Americas, 3rd Floor, New York, NY 10036.