

SUBSCRIBE

# Privacy Policy

# Privacy Policy

IN EFFECT: JANUARY 1, 2019

LAST UPDATED: SEPTEMBER 15, 2020

## Introduction

This privacy policy (this “**Policy**”) describes the collection of personal information by Strategic Alternative Funds Group., a Delaware corporation (“**SAF**,” “**we**,” or “**us**”) from users of our Website at [www.subscribeplatform.com](http://www.subscribeplatform.com) (the “**Website**”), as well as all related applications, widgets, software, tools, and other services provided by us and on which a link to this Policy is displayed (collectively, together with the Website, our “**Services**”). This Policy also describes our use and disclosure of such information. By using our Services, you consent to the collection, use, and disclosure of personal information in accordance with this Policy. This Policy is subject to the provisions of any SAF Terms of Use that incorporate this Policy by reference.

## Personal Information

“Personal Information,” as used in this Policy, is information that specifically identifies an individual, such as an individual’s name, address, telephone number, or e-mail address. Personal Information also includes information about an individual’s activities, such as information about his or her activity on our Services, and demographic information, such as date of birth, gender, geographic area, and preferences, when any of this information is linked to Personal Information that identifies that individual.

Personal Information does not include “aggregate” or other non-personally identifiable information. Aggregate information is information that we collect about a group or category of products, services, or users that is not personally identifiable or from which individual identities are removed. We may use and disclose aggregate information, and other non-personally identifiable information, for various purposes.

Although information uploaded to the Service by an SAF customer for processing (“**Customer Data**”) may include information that specifically identifies an individual (e.g., an SAF customer could upload to the Service information about its customers in order perform wealth management services for those customers via the Services, including information that specifically identifies individuals such as name and email address), that information is not Personal Information for the purposes of this Policy. Please see the “Customer Data and Security” section below for information regarding SAF’s handling of Customer Data.

## Collection of Information

### Collection of Voluntarily-Provided Information

We collect Personal Information that our users provide to us in a variety of ways on our Services. These include the following:

- *E-mail Newsletters.* We may offer e-mail newsletters from time to time on our Services. If you sign up to receive a newsletter from us, we collect your e-mail address.
- *Correspondence.* If you contact us by e-mail, using a contact form on the Services, or by mail, fax, or other means, we collect the Personal Information contained within and associated with your correspondence.

### Passive Information Collection

When you visit our Services, some information is collected automatically. For example, when you access our Services, we automatically collect your browser's Internet Protocol (IP) address, your browser type, the nature of the device from which you are visiting the Services (e.g., a personal computer or a mobile device), the identifier for any handheld or mobile device that you may be using, the Web site that you visited immediately prior to accessing any Web-based Services, the actions you take on our Services, and the content, features, and activities that you access and participate in on our Services.

We may collect this information passively using technologies such as standard server logs, cookies, and clear GIFs (also known as "Web beacons"). We use passively-collected information to administer, operate, and improve the Website and our other services and systems, to improve the effectiveness of advertising on our Services, and to provide advertisements and other content that is tailored to you. If we link or associate any information gathered through passive means with Personal Information, or if applicable laws require us to treat any information gathered through passive means as Personal Information, we treat the combined information as Personal Information under this Policy. Otherwise, we use and disclose information collected by passive means in aggregated form or otherwise in a non-personally identifiable form.

Also, please be aware that third parties, such as companies displaying advertisements on the Services or sites or services provided by third parties ("**Third-Party Sites**") that may be linked to from the Services, may set cookies on your hard drive or use other means of passively collecting information about your use of their services, Third-Party Sites or content. We do not have access to, or control over, these third-party means of passive data collection.

### Information from Other Sources

We may receive information about you, including Personal Information, from third parties, and may combine this information with other Personal Information we maintain about you. If we do so, this Policy governs any combined information that we maintain in personally identifiable format.

## **Use of Personal Information**

We use Personal Information to provide services and information that you request; to enhance, improve, operate, and maintain our Services, our programs, services, Web sites, and other systems; to prevent fraudulent use of our Services and other systems; to prevent or take action against activities that are, or may be, in violation of our Terms of Use or applicable law; to tailor advertisements, content, and other aspects of your experience on and in connection with the Services; to maintain a record of our dealings with you; for other administrative purposes; and for any other purposes that we may disclose to you at the point at which we request your Personal Information, and pursuant to your consent.

## **Disclosure of Personal Information**

Except as described in this Policy, we will not disclose your Personal Information that we collect on the Services to third parties without your consent. We may disclose information to third parties if you consent to us doing so, as well as in the following circumstances:

### **Service Providers**

We may disclose Personal Information to third-party service providers (e.g., payment processing and data storage and processing facilities) that assist us in our work. We limit the Personal Information provided to these service providers to that which is reasonably necessary for them to perform their functions, and we require them to agree to maintain the confidentiality of such Personal Information.

### **Business Transfers**

Information about our users, including Personal Information, may be disclosed and otherwise transferred to an acquirer, or successor or assignee as part of any merger, acquisition, debt financing, sale of SAF assets, or similar transaction, as well as in the event of an insolvency, bankruptcy, or receivership in which Personal Information is transferred to one or more third parties as one of our business assets.

### **USA Patriot Act**

To help the government fight the funding of terrorism and money laundering activities, Federal law requires all financial institutions to obtain, verify, and record information that identifies each client of the firm. What this means for you is when you became a client with our firm, we asked for your name, address, date of birth, and other information that allowed us to identify you. We may have also asked to see your driver's license or other identifying documents.

### **To Protect Our Interests**

We also disclose Personal Information if we believe that doing so is legally required, or is in our interest to protect our property or other legal rights (including, but not limited to, enforcement of our agreements), or the rights or property of others, or otherwise to help protect the safety or security of our Services and other users of the Services.

## Access

If we offer the ability to create user accounts or profiles on our Services, you may have the ability to access and update many categories of personal information that you provide to us by logging into your account and accessing your account settings. If you wish to access or amend any other personal information we hold about you, you may contact us at [info@safplatform.com](mailto:info@safplatform.com).

If you request that we delete your account on any of our Services (via a user settings page, by e-mail, or otherwise), we will do so within a reasonable period of time, but we may need to retain some of your Personal Information in order to satisfy our legal obligations, or where we reasonably believe that we have a legitimate reason to do so.

## Links

The Services may contain links to other Web sites, products, or services that we do not own or operate. For example, the Services may contain links to Third-Party Sites such as social networking services. If you choose to visit or use any Third-Party Sites or products or services available on or through such Third-Party Sites, please be aware that this Policy will not apply to your activities or any information you disclose while using those Third-Party Sites or any products or services available on or through such Third-Party Sites. We are not responsible for the privacy practices of these Third-Party Sites or any products or services on or through them. Additionally, please be aware that the Services may contain links to Web sites and services that we operate but that are governed by different privacy policies. We encourage you to carefully review the privacy policies applicable to any Web site or service you visit other than the Services before providing any Personal Information on them.

## International Visitors

Our servers and data centers are located in the United States. If you choose to use the Services from outside the U.S., then you should know that you are transferring your Personal Information outside of your region and into the U.S. for storage and processing. By providing your Personal Information to us through your use of the Service, you agree to that transfer, storage, and processing in the U.S. Also, we may transfer your data from the U.S. to other countries or regions in connection with storage and processing of data, fulfilling your requests, and operating the Services. You should know that each region can have its own privacy and data security laws, some of which may be less stringent as compared to those of your own region.

## Customer Data and Security

SAF customers may electronically submit Customer Data to the Service for processing purposes. SAF will not review, share, distribute, or reference any Customer Data except as provided in the license agreement between SAF and the customer, or as may be required by law. In accordance with SAF's license agreements, SAF may access Customer Data only for the purpose of providing the Service, preventing or addressing service or technical

problems, at a customer's request in connection with customer support matters, or as may be required by law.

SAF uses reasonable security measures that are designed to protect Personal Information and Customer Data from accidental loss, disclosure, misuse, and destruction. These measures include regular review of our data collection and storage process, ensuring that the data is encrypted and that we have up-to-date security software on our networks and servers. Please be aware, however, that no data security measures can be guaranteed to be completely effective. Consequently, we cannot ensure or warrant the security of any information that you or our enterprise customers provide to us. You transmit information to us at your own risk.

## **Responsibilities**

SAF's General Counsel is responsible for the review, approval, monitoring, updating, and enforcement of this Policy.

## **Updates to this Policy**

We may occasionally update this Policy. When we do, we will also revise the "last updated" date at the beginning of the Policy. Your continued use of our Services after such changes will be subject to the then-current policy. If we change this Policy in a manner that is materially less restrictive of our use or disclosure of your Personal Information, we will use reasonable efforts to notify you of the change and to obtain your consent prior to applying the change to any Personal Information that we collected from you prior to the date the change becomes effective. We encourage you to periodically review this Policy to stay informed about how we collect, use, and disclose personal information.

## **Contacting Us**

If you have any questions or comments about this Policy, please contact us using the following contact information: [info@safplatform.com](mailto:info@safplatform.com).