

## **PRIVACY POLICY**

**Effective as of October 2015**

We have created this privacy policy (this “Privacy Policy”), because we know that you care about how information you provide to us is used and shared. This Privacy Policy relates to the information collection and use practices of One Rock Capital Partners, LLC (“One Rock”) when you access and use the Site.

By accessing and using the Site, you are agreeing to the terms of this Privacy Policy and the accompanying Terms of Use, which are incorporated herein by reference. Capitalized terms not defined in this Privacy Policy shall have the meaning set forth in our Terms of Use.

In addition to this Privacy Policy, depending on your relationship with One Rock, you may receive and be covered by our Investor Privacy Notice, other privacy disclosures within account opening documents, and other privacy and security rules, as may be applicable.

### **The Information We Collect**

#### 1. Personal Information

When you sign up to become a registered user of the Site or sign up for any of our alerts, newsletters, or other communications, you will be required to provide us with personal information about yourself, which may include your name, address, e-mail address, financial background, and other personal information (collectively, “Personal Information”). We do not collect any Personal Information from you when you use the Site unless you provide us with the Personal Information voluntarily or authorize us to access it.

#### 2. Other Information

In addition to the Personal Information, we may collect additional information (collectively, the “Other Information”). Such Other Information may include:

a. From You. Additional information about yourself that you voluntarily provide to us, such as gender, product and service preferences, and other information that does not identify you personally.

b. From Your Activity. Information that we automatically collect when you use the Site. For example, when you visit the Site, we may collect your IP address, browser type and language, referring and exit pages and URLs, date and time, amount of time spent on particular pages, and sections of the Site visited.

c. From Cookies. Information that we collect using “cookie” technology. Cookies are small packets of data that a website stores on your computer’s hard drive so that your computer will “remember” information about your visit. We may use both session cookies (which expire once you close your web browser) and persistent cookies (which stay on your computer until you delete them) to help us collect Other Information and to enhance your experience using the Site. If you do not want us to place a cookie on your hard drive, you may be able to turn that feature off on your computer. Please consult your Internet browser’s documentation for information on how to do this and how to delete persistent cookies. However, if you decide not to accept cookies from us, the Site may not function properly.

## **Communication Preferences**

You may manage your receipt of marketing and non-transactional communications by clicking on the “unsubscribe” link located on the bottom of any One Rock marketing email. We will use commercially reasonable efforts to process such requests in a timely manner. You should be aware, however, that it is not always possible to completely remove or modify information in our databases. However, you cannot opt out of receiving transactional e-mails related to your account.

## **How We Use and Share the Information**

We use the Personal Information and the Other Information (collectively, the “Information”) to provide services to you; provide and improve the Site; solicit your feedback; and inform you about our products and services and those of our third-party marketing partners. Also, we may use and share the Information as described below.

- In an ongoing effort to better understand our users and Site, we might analyze the Other Information in aggregate form in order to operate, maintain, manage, and improve the Site. This aggregate information does not identify you personally. We may share this aggregate data with our affiliates, agents, and business partners. We may also disclose aggregated user statistics in order to describe our products and Site to current and prospective business partners and to other third parties for other lawful purposes.
- We may employ other companies and individuals to perform functions on our behalf. Examples may include providing network services, information technology support, and customer service. These other companies will have access to the Information only as necessary to perform their functions and to the extent permitted by law.
- We may share some or all of your Information with any of our parent companies, subsidiaries, joint ventures, or other companies under common control with us.
- As we develop our businesses, we might sell or buy businesses or assets. In the event of a corporate sale, merger, reorganization, sale of assets, dissolution, or similar event, the Information may be part of the transferred assets.
- To the extent permitted by law, we may also disclose Information when required by law, court order, or other government or law enforcement authority or regulatory agency, or whenever we believe that disclosing such information is necessary or advisable, for example, to protect the rights, property, or safety of One Rock or others.

## **How We Protect Your Information**

We take commercially reasonable steps to protect the Information from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. Please understand, however, that no security system is impenetrable. We cannot guarantee the security of our databases or the databases of the third parties with which we may share such Information, nor can we guarantee that the information you supply will not be intercepted while being transmitted over the Internet. In particular, e-mail sent to us may not be secure, and you should therefore take special care in deciding what information you send to us via e-mail.

### **Important Notice to Non-U.S. Residents**

The Site is operated in the United States. If you are located outside of the United States, please be aware that any information you provide to us will be transferred to the United States. By using the Site and/or providing us with any information, you irrevocably and unconditionally consent to this transfer.

### **California Residents**

One Rock does not monitor, recognize, or honor any opt-out or do not track mechanisms, including general web browser “Do Not Track” settings and/or signals.

### **Children**

We do not knowingly collect Personal Information from children under the age of 13 through the Site. In fact, our Terms of Use prohibit individuals under 18 from accessing and using the Site. If you are under 13, please do not use the Site or give us any Personal Information. We encourage parents and legal guardians to monitor their children’s Internet usage and to help enforce our Privacy Policy by instructing their children to never provide us Personal Information without their permission. If you have reason to believe that a child under the age of 13 has provided Personal Information to us, please contact us, and we will use commercially reasonable efforts to delete that information from our databases, though there can be no assurance that we are able to do so.

### **External Websites**

You may use the Site to access third-party websites, and the Site or the advertisements you receive through the Site may contain links to third-party websites. One Rock has no control over the privacy practices or the content of any of the third-party websites that you may access using the Site or the websites of our business partners, advertisers, sponsors, or other websites to which we provide links. As such, we are not responsible for the content or the privacy policies of those third-party websites. You should check the applicable third-party privacy policy and terms of use when visiting any other websites.

### **Changes to This Privacy Policy**

This Privacy Policy is effective as of the date stated at the top of this Privacy Policy. We may change this Privacy Policy from time to time, and will post any changes on the Site as soon as they go into effect. By accessing or using the Site after we make any such changes to this Privacy Policy, you are deemed to have accepted such changes. Please refer back to this Privacy Policy on a regular basis.

### **How to Contact Us**

If you have questions about this Privacy Policy, please e-mail us at: [info@onerockcapital.com](mailto:info@onerockcapital.com).