

Cudos LLC

Privacy Policy

Last Modified: March 1, 2019

Cudos, LLC, an Arizona limited liability company (“Cudos”, “we”, “us”, and “our”) is committed to protecting your privacy and personal information that you provide to us when accessing or using our services or website (the “Site”). This privacy policy (this “Policy”) explains how we gather and use the information that we collect during your visit our Site. This Policy may change over time, so please be sure to reread it from time to time. Amendments, modifications or changes to this Policy will be posted at this URL and will be effective when posted. Your continued use of our Site following the posting of any amendment, modifications or change to this Policy shall constitute your acceptance thereof. If you do not agree with the terms in this Policy, please do not use our website and do not provide any information to us.

Authorized Users

Our Site is not directed to and is not intended for access and use by persons under the age of 21. We do not intentionally collect or use Personal Data from users that we have reason to believe are under the age of 21. If you are under the age of 21, please do not submit any Personal Data to Cudos or use the Site. If a parent or guardian becomes aware that his or her child under the age of 21 has provided us with Personal Data, he or she should contact us at support@cudosc corp.com, and we will, subject to our recordkeeping obligations under the Investment Advisers Act of 1940 and other applicable law, delete such information from our files.

Personal Data Collected

Cudos, through our third-party services providers, gathers Personal Data and Other Data (as described below).

Personal data is information that identifies you or can be used to identify or contact you, e.g., your name, email address, address, phone number, social security number of taxpayer identification number, date of birth, occupation and employer, tax filing status, marital status, financial information, bank account information, including without limitation routing numbers and account numbers (“Personal Data”). If you are accessing the Site or our services on behalf of an employer entity, Personal Data shall also include the company name, industry, employee data and information, and location. Cudos and our third-party service providers may need to collect and process Personal Data in order to provide requested information, products or services to you (including the Site) or because Cudos or our third-party services providers are legally required to do so.

- Account Registration. Cudos and our third-party service providers request Personal Data from you for account registration. The registration process requests that you provide certain information, including without limitation your name, email address, address, phone number, and employer affiliation, if any. This information must be stored on the Site, and is accessible to anyone with whom you share your username and password. For this reason, please safeguard your username and password carefully and do not disclose it to any other person.
- Voluntary Disclosure. Cudos and our third-party service providers may collect Personal Data voluntarily provided by you, including in emails to the Site, online forms, order and registration forms, surveys, promotion participation, phone calls and online chats with our customer service and through other means.
- Payment Services. Cudos may use third-party payment services (each, a “Payment Service”) to collect payments made through the Site. If you wish to make a payment through the Site, you may be directed to a webpage that is hosted by the Payment Service (or the Payment Service’s service providers) and not by us. Any Personal Data that you provide through a Payment Service page will be collected by Payment Service and not by us, and will be subject to Payment Service’s privacy policy, rather than this Policy.

We have no control over, and are not responsible for, Payment Service's use of information collected through the Payment Service page.

- Other Means. Cudos and our third-party service providers may collect information through various other means, including participation at conferences and events, individual introductions, from employers that enroll their employees in our services, and from selected third-party business partners. From time to time, we may also acquire from third parties certain lists containing the names and contact information of individuals who may be interested in our products and services.

Use and Disclosure of Personal Data

Cudos and our third-party service providers may use Personal Data for legitimate business purposes, including the following:

- Fulfillment of Requests. Cudos and our third-party service providers may use Personal Data about you (a) to deliver products and services to you, (b) provide you with information about products and services you've ordered, (c) when it is necessary for employees, agents and contractors to operate or maintain the website or to correct a technical problem, (d) when it is necessary to verify the existence or condition of your account with a financial institution, credit bureau, insurance provider, or other third-party, and (e) to authenticate your identity and perform background checks as required under applicable regulations. Cudos and our third-party service providers will engage in these activities to manage our contractual relationship with you and/or to comply with a legal obligation.
- Custodial Requirements: We may share your information with the third-party custodian for your account, for any legal purpose, including to satisfy the custodian's regulatory requirements as a broker-dealer and custodian, as well as IRA custodian where applicable, and to facilitate the execution of transactions, including contributions and withdrawals;
- Other Communications. From time to time, Cudos and our third-party service providers may use Personal Data about you to inform you of products, programs, services and promotions that we believe may be of interest to you. If you or your employer is one of our customers, we may also inform you of such products, programs, services and promotions using Personal Data about you that you or your employer provided to us. If you would prefer that we not send electronic marketing messages to you, please see the "opt-out" section below.
- Promotions. Cudos and our third-party service providers may operate sweepstakes, contests and similar promotions (collectively, "Promotions"). If you choose to enter the Promotions, we typically ask you for certain Personal Data when you enter and, if applicable, win a Promotion. You should carefully review the rules of each Promotion in which you participate, as they may contain additional important information about our use of Personal Data about you. To the extent that the terms and conditions of such rules concerning the treatment of your Personal Data conflict with this Policy, the terms and conditions of such rules shall control. Cudos and our third-party service providers use this information to operate the Promotions.
- Other Business Purposes. Cudos and our third-party service providers may also use Personal Data about you for other business purposes, such as data analysis (for example, to improve the efficiency of our Site and services), editorial and feedback purposes, providing customer support, customizing and improving the content and layout of the Site, completing business transactions (for example, to confirm content requested is received by users), development of marketing and promotion plans and materials, statistical analysis of user behavior (for example, to understand what parts of the Site are of most interest to users), product development, market research, administering individual accounts, and meeting government regulatory requirements such as sales tax collection, audits, etc. Cudos and our third-party service providers engage in these activities to manage our contractual relationship with you, to comply with a legal obligation, and/or because we have a legitimate interest.

- Administrative Communications. Cudos and our third-party service providers reserve the right to use Personal Data to send to you important information regarding the Site, products, services, your account status, changes to the Site's terms of use, this Policy, or any other policies, agreements or transactions relevant to your use of the Site, products and/or services. Because this information may be important to your use of the Site, products and/or services, you may not opt-out of receiving such communications. We will engage in this activity to manage our contractual relationship with you and/or to comply with a legal obligation.

We may disclose Personal Data for the following purposes:

- Third-Party Service Providers. We may provide Personal Data to third-party service providers, who provide services to us, including but not limited to, data analysis, order fulfillment, payment processing, and other services.
- Affiliate Communications. We may transfer Personal Data among our affiliates to allow our affiliates to contact you regarding products, programs, services and promotions that they believe may be of interest to you, and such affiliates may otherwise use your Personal Data in accordance with this Policy. If you would prefer not to receive marketing communications from us or our affiliates, please see the "opt-out" section below. Cudos, LLC will be the party responsible for jointly used Personal Data.
- Strategic Partners and Co-Branded Sites. From time to time, we may enter into a special relationship with another company that is not owned by or affiliated with us to provide or promote joint products, services, applications, or features (together, "Jointly Offered Items"). These special relationships may include co-branded web sites ("co-branded pages"). Any information, including Personal Data, that you provide in connection with one of these Jointly Offered Items, and/or on one of these co-branded pages, will be shared with our third-party partners. You should check these third parties' web sites for information regarding their privacy practices. PLEASE NOTE THAT THIS POLICY DOES NOT ADDRESS THE PRIVACY OR INFORMATION PRACTICES OF ANY THIRD PARTIES. If you do not want Personal Data about you shared with such third parties, please do not provide Personal Data in connection with the Jointly Offered Items and/or co-branded pages.
- Third-Party Data Providers. If you subscribe to one of our products or services that contains third-party data, we may be required to provide your Personal Data to the third party as part of our reporting obligations. We will only do so if a third-party data provider conditions your receipt of their data on knowing your identity.
- Conferences and Events. When you attend a conference or event organized by us, your name and contact information may be shared with other attendees.
- Promotions. We may share the Personal Data you provide in connection with Promotions with third-party sponsors of such Promotions (irrespective of whether such Promotions are hosted by us), or otherwise in accordance with the rules applicable to those Promotions.
- Assignment. We may disclose or transfer any and all Personal Data that we collect to an affiliated entity or a third party (and their respective advisors) in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including without limitation in connection with any bankruptcy or similar proceedings).
- Law Enforcement; Emergencies; Compliance. Cudos and our third-party service providers may use and disclose Personal Data about you to others as we believe to be appropriate: (a) in compliance with laws, rules, or regulations in any country in which we operates, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from government or public authorities, including government and public authorities outside your country of residence; (d) to enforce our Site's terms of use; (e) to protect our operations or those of any affiliated entities; (f) to protect the rights, privacy, safety or property of us, our affiliated entities, you, or others; and (g) to permit us to pursue available remedies or limit the damages that we may sustain. For example, we may, to the fullest

extent the law allows, disclose Personal Data about you to law enforcement agencies to assist them in identifying individuals who have been or may be engaged in unlawful activities.

Collection and Use of Other Data

We and our service providers may also collect and use the following types of data, referred to in this Policy as “Other Data”:

- Monitoring Data. Cudos and our third-party service providers may collect and/or track other information such as demographic information, domain names, computer type, browser types, screen resolution, and other statistical data involving the use of the Site (“Monitoring Data”). We use Monitoring Data to help us understand who uses the Site and to improve and market it, as well as our other web sites and services. Unless combined with Personal Data, Monitoring Data does not personally identify you or any other user, and we may use it for any purpose.
- Aggregated Data. We may aggregate Personal Data in a manner such that the end-product does not personally identify you or any other user of the Site, for example, by using information to calculate the percentage of our users who have a particular telephone area code. Such aggregate information may also be used for any purpose.
- Cookies. To enhance the Internet experience on the Site, Cudos and our third-party service providers may use ‘cookies’ on the Site. Cookies are data that a web server transfers to an individual’s computer for recordkeeping and other purposes. We use cookies and other technologies to facilitate users’ ongoing access to and use of our Site. If you do not want information collected through the use of cookies, there is a simple procedure in most browsers that allows you to automatically decline cookies, or to be given the choice of declining or accepting the transfer of a particular cookie, or cookies from a particular web site, to your computer. If cookies are disabled, however, all features of the Site may not operate as intended. Information about disabling cookies can be found on your Internet browser provider’s web site. The Site may have a Cookie Policy that applies to its use of cookies and other similar tracking technologies. If it does, then the Cookie Policy will apply in addition to this Policy.
- Tools. Cudos and our third-party service providers may also use various common Internet tools such as ‘pixel tags,’ ‘action tags,’ ‘web beacons,’ ‘.gif tags,’ ‘JavaScript’ or similar technologies (together, “Tools”) in connection with Site pages and email messages in certain formats to, among other things, track the actions of Site users and email recipients, to determine the success of marketing campaigns and to compile statistics about Site usage and response rates. Tools allow us to count users who have visited certain pages of the Site, to deliver services, and to help determine the effectiveness of promotional or advertising campaigns. When used in email messages in certain formats, Tools can tell the sender whether and when the email has been opened.

We uses cookies and Tools to understand how the Site is used and to customize and enhance the Internet experience of individual users. When you revisit the Site, we may recognize you by a Tool and customize your experience. For example, once you have completed the registration process, a cookie and/or Tool will be used to avoid having you register again. We believe cookies and Tools add value to the user experience.

- Google Analytics. We may use Google Analytics, which uses cookies and other similar technologies, to collect and analyze information about Site use and to report on activities and trends. The service may also collect information regarding the use of other websites, apps and online resources. You can learn about Google’s practices by going to <https://policies.google.com/privacy/partners>, and opt out of them by downloading the Google Analytics opt-out browser add-on, available at <https://tools.google.com/dlpage/gaoptout>.
- Verification. We may use third-party services to verify that you are a human user. Any information collected as part of such verification is subject to the privacy policy of the third-party service provider.

- **IP Addresses.** When you visit and interact with the Site, Cudos and our third-party service providers may collect Internet Protocol (IP) addresses. Your IP address is a number that is automatically assigned to the computer that you are using by your Internet Service Provider (ISP). This number is identified and logged automatically in our server log files whenever you visit the Site, along with the time(s) of your visit(s) and the page(s) that you visited. We use IP addresses to understand how the Site is used by our users, to improve the Site and to enhance user experience of the Site. We may also use your IP address to help diagnose problems with our server and to administer our Site. We may also derive your approximate location from your IP address.

Our Advertising

We may use third-party advertising companies to serve advertisements regarding products and services that may be of interest to you when you access and use the Site, our apps and other websites or online services, based on information relating to your access to and use of the Site and other websites or online services on any of your devices, as well as on information received from third parties. To do so, these companies may place or recognize a unique cookie on your browser (including through the use of pixel tags). They may also use these technologies, along with information they collect about your online use, to recognize you across the devices you use, such as a mobile phone and a laptop.

Security

We may store your Personal Data. This information is retained and used in accordance with existing laws, rules, regulations, and other policies.

While there is no such thing as “perfect security” on the Internet, we will take reasonable steps to insure the safety of your Personal Data. Personal Data is stored on our server and is not publicly accessible. To prevent unauthorized access, maintain data accuracy, and ensure the correct use of information, we take reasonable precautions and have security measures in place to protect the loss, misuse and alteration of the information under our control. Although we attempt to ensure the integrity and security of our network and systems, we cannot guarantee that our security measures will prevent third-party “hackers” from illegally obtaining this information. We are not responsible for any breach of its security or for the actions of any third parties that may obtain any Personal Data. You are prohibited from violating or attempting to violate security for or otherwise interfering with the operation of the website. **We do not make, and expressly disclaim, any representation or warranty, express or implied, regarding the security or integrity of the website and your Personal Data.**

If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), please notify us of the problem immediately by sending an e-mail to support@cudosc corp.com or call us at 480-938-8833.

Data Integrity; Retention Period

We will use Personal Data only in ways that are compatible with the purposes for which it was collected, authorized by this Policy, or authorized by you. We will take reasonable steps to ensure that Personal Data is relevant to its intended use, and is accurate, complete, and current (as provided by you). We depend on you to update or correct your Personal Data whenever necessary.

We will retain Personal Data about you for as long as needed or permitted in light of the purpose(s) for which it was obtained and consistent with applicable law. The criteria used to determine our retention periods include: (i) the length of time we have an ongoing relationship with you; (ii) whether there is a legal obligation to which we are subject; and (iii) whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation or regulatory investigations).

Consent

By visiting our Site, you expressly consent to the collection and use by us of Personal Data according to this Policy.

Choice; Opt-Out

We give you choices regarding our use and disclosure of your Personal Data for marketing purposes.

- If you no longer want to receive marketing-related emails from us on a going-forward basis, you may stop receiving these marketing-related emails by sending an e-mail to support@cudoscorp.com.
- If you would prefer that we do not share your Personal Data on a going-forward basis with our affiliates or with unaffiliated third parties for their marketing purposes, you may cease this sharing by sending an e-mail to support@cudoscorp.com.

We will try to comply with your request(s) as soon as reasonably practicable. Please note that if you exercise the second option as described above, we will not be able to remove your Personal Data from the databases of our affiliates or unaffiliated third parties with which we have already shared your Personal Data (i.e., to which we have already provided your Personal Data as of the date that we implement your request). Further, please note that requesting us not to share your Personal Data with affiliates or unaffiliated third parties may result in you no longer receiving any marketing emails from us. Please also note that if you choose not to receive marketing-related messages from us, we may still send you important administrative messages, and you cannot elect to stop receiving such administrative messages, unless you choose to stop receiving services from us.

You may also indicate your choices regarding marketing-related emails by contacting us via postal mail or telephone using the our contact information below, or if you have a Site profile/account, by changing your preferences on your Site profile/account at any time.

Correct; Update

If you would like to request to review, correct, update, suppress, delete or otherwise limit our use of your Personal Data that has been previously provided to us, or if you would like to request to receive an electronic copy of your Personal Data for purposes of transmitting it to another company (to the extent this right to data portability is provided to you by applicable law), you may make a request by contacting us by sending an e-mail to support@cudoscorp.com. We will respond to your request consistent with applicable law. For your protection, we may only implement requests with respect to the Personal Data associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable and consistent with applicable law. Please note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions that you began prior to requesting the change or deletion. There may also be residual information that will remain within our databases and other records, which will not be removed.

Links

The Site may contain links to other Internet web sites, including social media sites and third-party hosted collaboration tools. These linked sites are not under our control. We provide links only as a convenience, and we does not endorse or control, and is not responsible for, the privacy practices or the content of these linked sites. If you provide any Personal Data through any third-party web site, or choose to communicate with us using third-party collaboration tools or other social media platforms, your transaction will occur on that third party's web site (not the Site) and the Personal Data you provide will be collected by, and controlled by the privacy policy of, that third party. We recommend that you familiarize yourself with the privacy policies and practices of any such third parties. PLEASE NOTE THAT THIS POLICY DOES NOT ADDRESS THE PRIVACY OR INFORMATION PRACTICES OF ANY THIRD PARTIES, INCLUDING, WITHOUT LIMITATION, AFFILIATED ENTITIES THAT DO NOT POST OR LINK DIRECTLY TO THIS POLICY.

Governing Law and Enforcement of Privacy Policy

Use of our website is governed by United States law and the laws of the State of Arizona. If you are accessing the website or services from a physical location outside of the United States with laws or regulations governing personal data collection, use, and disclosure that are different from United States laws, you agree that by accessing the website or services, you are transferring your Personal Data and Other Data to the United States and you consent to the application of the laws of the United States and the State of Arizona with respect to use of the website and services and any dispute regarding the website or this Policy. You further consent to the exclusive jurisdiction of the state and federal courts located in Arizona. If any provision of this Policy is held by a court of competent jurisdiction to be illegal, unenforceable, or in conflict with any applicable law, the validity of the remaining portions or provisions shall remain in full force and effect.

Do Not Track Disclosures

We do not respond to Do Not Track (“DNT”) signals at this time. Some third party sites may track your actions when you are browsing and accessing content. Various browsers offer a DNT option that sends a signal to third parties that you do not want to be tracked.

Data Controller

For the purposes of this Policy, you are the Data Controller of your Personal Data. “Data Controller” means a person who (either alone or jointly or in common with other persons) determined the purposes for which and the manner in which any Personal Data is, or will be, processed. We should be considered only as a processor on your behalf as to any Personal Data that is subject to the requirements of European Union’s Directive 95/46/EC. We may use the services of various third-party service providers in order to process your data more effectively.

Cross Border Transfer of Personal Data

Your Personal Data may be stored and processed in any country where we have facilities or in which we engage service providers. If you are accessing the Site from outside the United States, you may be sending information, including Personal Data to the United States where our servers are located. That information may be transferred within the United States or back out of the United States to other countries outside your country of residence. These countries do not necessarily have data protection laws as comprehensive as those in your country. Information transferred to the United States or another country is subject to the laws of that country and may be disclosed or accessed in accordance with those laws. By transferring information or allowing information to be transferred to us, you consent to the transfer, processing and storage in countries outside your country of residence. In certain circumstances, courts, law enforcement agencies, regulatory agencies, or security authorities in those other countries may be entitled to access your Personal Data.

Contact Us.

If you have any questions about this Policy or the practices of our website, you can e-mail us at support@cudoscop.com or call is at 480-938-8833.