

# PRIVACY AND SECURITY

# SORIANO GLOBAL

# HOLDINGS L.P.

# PRIVACY POLICY

## **Your Privacy Is Important to Soriano Group**

In the course of serving you as an individual client or as someone associated with a corporate or institutional client, Soriano Group may obtain personal information about you. Obtaining this information is important to our ability to deliver the highest level of service to you, but we also recognize that you expect us to treat this information appropriately.

This policy describes the types of personal information we may collect about you, the purposes for which we use the information, the circumstances in which we may share the information and the steps that we take to safeguard the information to protect your privacy. As used throughout this policy, the term "Soriano Group" refers to The Soriano Consulting Group, LLC. , and its affiliates worldwide.

## **The Sources of Information**

The personal information we collect about you comes primarily from the account applications or other forms and materials you submit to Soriano Group during the course of your relationship with us. We may also collect information about your transactions and experiences with Soriano Group relating to the products and services Soriano Group provides. In addition, depending on the products or services you require, Soriano Group may obtain additional information about you, such as your credit history, from consumer reporting agencies.

Finally, in the provision of financial services to you and subject to strict compliance with all applicable laws and regulations, information may be collected about you indirectly from monitoring or other means (e.g. recording of telephone calls and monitoring e-mails). In these circumstances, the information is not accessed on a continuous or routine basis, but it may be used for compliance or security purposes.

## **The Information We Have about You**

If you deal with Soriano Group in your individual capacity (e.g. as a private client), or as a settlor/trustee/beneficiary of a trust, or as an owner or principal of a company or other investment vehicle established to invest on your behalf or on behalf of your family, etc., the typical information we collect about you would include:

- Your name, address and other contact details;

- Your age, occupation and marital status;
- Extensive financial information, including source of wealth, investment experience and objectives, risk tolerance and, in certain jurisdictions, representations required under applicable law or regulation concerning your financial resources;
- A head and shoulders photograph from, as applicable, your passport, national identity card or driver's license, as required by laws and regulations addressing due diligence and related matters; and
- A personal identifier such as, depending on your country of residence, your Social Security Number, National Insurance Number, Tax File Number, etc.

If you are an employee/officer/director/principal, etc. of one of our corporate or institutional clients, the typical information we collect about you personally would include:

- Your name and contact details;
- Your role/position/title and area of responsibility; and
- Certain identifying information (e.g. passport photo, etc.) as required by laws and regulations addressing money laundering and related matters.

Of course, you are not required to supply any of the personal information that we may request. However, failure to do so may result in our being unable to have a relationship or to provide services to you. While we make every effort to ensure that all information we hold about you is accurate, complete and up to date, you can help us considerably in this regard by promptly notifying us if there are any changes to your personal information.

### **Our Use of Your Personal Information**

We may use your personal information to:

- Administer, operate, facilitate and manage your relationship and/or account with Soriano Group. This may include sharing such information internally as well as disclosing it to third parties, as described in the following two sections, respectively;
- Contact you or, if applicable, your designated representative(s) by post, telephone, electronic mail, facsimile, etc., in connection with your relationship and/or account;
- Provide you with information (such as investment research), recommendations, or advice concerning products and services offered by Soriano Group; and
- Facilitate our internal business operations, including assessing and managing risk and fulfilling our legal and regulatory requirements.

If your relationship with Soriano Group ends, Soriano Group will continue to treat your personal information, to the extent we retain it, as described in this policy.

### **Disclosures of Your Personal Information within Soriano Group**

In order to provide efficient and reliable services and to improve product and service options available to you, more than one entity within Soriano Group may be given, or given access to, your personal information. For example, one Soriano Group entity might share your information with another in order to facilitate settlement of your transactions or the maintenance of your accounts, or as part of its arranging for the performance of specialized services such as US and international brokerage, asset management and advisory and trust services. When so sharing your personal information, we adhere to applicable legal and industry standards regarding the protection of personal information. Additional information on how your personal information is protected while within Soriano Group is provided below, under Information Security: How We Protect Your Privacy.

### **Disclosures of Your Personal Information to Third Parties**

Soriano Group does not disclose your personal information to third parties, except as described in this policy. Third party disclosures may include sharing such information with non-affiliated companies that perform support services for your account or facilitate your transactions with Soriano Group, including those that provide professional, legal or accounting advice to Soriano Group. Non-affiliated companies that assist Soriano Group in providing services to you are required to maintain the confidentiality of such information to the extent they receive it and to use your personal information only in the course of providing such services and only for the purposes that Soriano Group dictates.

We may also disclose your personal information to fulfill your instructions, to protect our rights and interests and those of our business partners or pursuant to your express consent. Finally, under limited circumstances, your personal information may be disclosed to third parties as permitted by, or to comply with, applicable laws and regulations; for instance, when responding to a subpoena or similar legal process, to protect against fraud and to otherwise cooperate with law enforcement or regulatory authorities or with organizations such as exchanges and clearinghouses.

*You should know that Soriano Group will not sell your personal information.*

### **Soriano Global Holdings Limited, Malta**

#### **Information Security: How We Protect Your Privacy**

Soriano Group is committed to protecting the privacy and confidentiality of your personal information. We limit access to your personal information to authorized Soriano Group employees or agents and, as described above in Disclosures of Your Personal Information to Third Parties, our service providers are held to stringent standards of privacy. We also maintain physical, electronic and procedural safeguards to protect the information against loss, misuse, damage or modification and unauthorized access or disclosure. Some of the other central features of our information security program are:

- A dedicated group – the Information Security Department – that designs, implements and provides oversight to our information security program;
- The use of specialized technology such as firewalls;
- Testing of the security and operability of products and services before they are introduced to the Internet, as well as ongoing scanning for publicly known vulnerabilities in the technology;
- Internal and external reviews of our Internet sites and services;
- Monitoring of our systems infrastructure to detect weaknesses and potential intrusions;

- Implementing controls to identify, authenticate and authorize access to various systems or sites;
- Protecting information during transmission through various means including, where appropriate, encryption; and
- Providing Soriano Group personnel with relevant training and continually updating our security practices in light of new risks and developments in technology.

## **Privacy and the Internet**

The following additional information will be of interest to you as a visitor to this site:

- Users of private Soriano Group Web sites are required to identify and authenticate themselves prior to accessing our services. Generally, identification and authentication take place through the use of your user name and a password, or with an RSA SecurID\* Card and a Personal Identification Number (PIN).
- The private Soriano Group Web sites are built upon a secure infrastructure with multiple layers of protection, including measures ranging from proper physical security of our machines to system intrusion detection capabilities. Within such private sites, Soriano Group uses industry standard encryption technologies to protect your information from external compromise.
- “Cookies” are small text files that may be placed on your Web browser when you visit our Web sites or when you view advertisements we have placed on other Web sites.
- “Clickstream” data (e.g., information regarding which of our Web pages you access, the frequency of such access, and your product and service preferences) may be collected by Soriano Group itself, or by our service providers, using cookies, Web beacons, page tags, or similar tools that are set when you visit our Web site or when you view an advertisement we have placed on another Web site. Clickstream data and similar information may be shared internally within Soriano Group and used: for administrative purposes; to assess the usage, value and performance of our online products and services; to improve your experience with our Web sites; and as otherwise permitted by applicable law or regulation. If you are a Soriano Group client, this information helps us suggest products or service offerings that may be of interest to you. This information may be processed by us for the purposes described above, or on our behalf by third parties, solely in accordance with our instructions.
- When you visit this site, your browser may be momentarily directed to the Web site of an ad server or other third party service provider. This re-direction process will not be apparent to you. These third party Web sites automatically receive your IP address when this happens, and they may also collect information from your interaction with our Web sites including computer and connection information, standard Web log information, and ad information. Such information does not identify you individually.
- Soriano Group may make available on this Web site third party applications such as content linking or sharing facilities. Information collected by providers of such applications is governed by their privacy policies.
- Our Web sites are not currently configured to respond to “do not track” signals or similar mechanisms.

## **Other Privacy Policies or Statements; Changes to Policy**

This policy provides a general statement of the ways in which Soriano Group protects your personal information. You may, however, in

connection with specific products or services offered by Soriano Group, be provided with privacy policies or statements that supplement this policy. This policy may be changed from time to time to reflect changes in our practices concerning the collection and use of personal information. The revised policy will be effective immediately upon posting to our Web site. This version of the Policy is effective December 13, 2017.

Additional Information: The European Economic Area – Malta *(This section applies only if your information is processed by Soriano Group in a Member State of the European Economic Area (EEA)).*

You are entitled to access any personal data about you held by Soriano Group by sending a written request to the applicable individual identified below. You may be required to supply a valid means of identification as a security precaution to assist us in preventing the unauthorized disclosure of your personal information. We will process your request within the time provided by applicable law. You are also entitled to have Soriano Group modify or delete any information that you believe is incorrect or out of date.



# Terms and Conditions of Use

Access to the Soriano Group Web site defined below, is provided by SG. For purposes of this agreement, "SG" shall mean Soriano Group, LLC and its affiliates, and their officers, directors, managing directors, partners, and employees. The "Soriano Web site" shall mean the Web site of Soriano Group, LLC available to the general public and located at [www.sorianogroup.com](http://www.sorianogroup.com) and select other domains.

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