



MarshBerry Privacy Policy

This privacy policy (the "Privacy Policy") describes practices regarding the collection, use and dissemination of information by, on or through this MarshBerry website (at <http://www.marshberry.com>) and any related sites (e.g., <http://resourcehub.marshberry.com/>), mobile apps or other points of access (collectively, the "Website"), as presented by Marsh, Berry and Company, Inc., its subsidiaries and affiliates (collectively, "MarshBerry," "MB," "we" or "us"). This Privacy Policy supplements any Terms of Use that may govern access to and use of the Website (see <http://www.marshberry.com>) and by using the Website you acknowledge and consent to same.

We may modify this Privacy Policy from time to time. If we make changes to this Privacy Policy, we will post those changes at this location and may otherwise provide notice of any material changes so that You are aware of what information we collect, how we use it, and under what circumstances, if any, we share or disseminate it. Please review this Privacy Policy on a periodic basis.

Information We Collect

The Website is primarily informational in nature and is intended for users over 18 years of age ("Users" or "You"). In connection with accessing this Website, You may be asked for certain personal data and personally identifying information (which means information that can be linked to You as a particular individual, such as Your name, address, phone number, email address, Social Security number and the like (collectively, "PII"). Additionally, Your browser may tell us what type of computer and operating system You are using, as well as other kinds of technical information.

By using the Website, You acknowledge and agree that we may collect or receive and process information from or about You, including various types of PII. The types of PII collected will vary depending upon how You use the Website.

PII may be collected at various times, including, for example, when Users complete survey forms, respond to requests for information or content, request communications or report issues with the Website. Specific examples of types of PII the Website may collect include:

Contact Information, such as a User's name, address, phone number, facsimile number, and email address.

Demographic Information, such as certain characteristics common to a segment of the population and profile data provided voluntarily by Users in response to surveys and/or collected in order to continue to improve the quality of the Website and its services.

Survey Results, such as the answers and submissions Users provide in response to surveys, questionnaires and other inquiries sent to or made of Users from, on or through the Website.



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Technical Information, such as Internet Protocol (IP) addresses from collected from Users of the Website, as well as the date and time of access and the particular Web page(s) accessed. The Website may catalog Users' log-in information and computer, browser, and/or operating system information and maintain a database of aggregated information about certain activities and transactions on the Website (e.g., tool or feature utilization, accessing or selecting data or content).

Special Categories of PII, which reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership; genetic or biometric data uniquely identifying a natural person; and data concerning a person's health, sex life or sexual orientation ("Special Categories of PII") will only be collected and processed with Users' explicit consent for specified purposes.

Information Users Post

Additionally, Users may from time to time be permitted to post certain content to specified portions of the Website in the form of text, graphics, images, audio and video files and the like. Our use of such posted content may be described further in such specified portions of the Website.

How We Use Such Information

Different types of information collected or received on or through the Website, including PII, may be processed by us or our sub-processors, in the United States, and used and shared in different ways, including the following.

We may use Your contact information collected on or through the Website for purposes that include to advertise our services and the goods and services of third parties, to create a personalized experience for You, to provide You with news and information, to contact You regarding surveys, to notify You of material changes in the Website's policies, to advise You of new services the Website may offer, to share testimonials and otherwise. We may also share Your contact information and other PII with our event sponsors and other business partners, in order for them (or us) to provide services and information, for advertising purposes, and for internal business purposes. Additionally, we may share certain business data collected on or through the Website, including survey results, with our event sponsors and other business partners, including for business or marketing purposes or as may be required by law. We may also use technical information (including from Your computer) to help diagnose problems with the Website and its servers, to analyze the Website's usage trends, track User movements on the Website, and to otherwise manage and monitor the Website.

More generally, we may disclose information collected on, by or through the Website, including PII, when legally required to do so in accordance with government requests or regulations or legal proceedings. We may also disclose such information, including PII, to protect against misuse or unauthorized use of the Website or as is otherwise required to limit legal liability, to protect or defend our rights, property, or interests, or to protect the safety, rights, or property of others, including other Users.



Similarly, in the event that there is a business transaction, such as a merger or acquisition by another company involving the transfer of all or a portion of MarshBerry's assets, please note that the information collected on, by or through and retained by the Website, including PII, may be among the assets transferred. In such an event, we will notify You via email and/or place a prominent notice on the Website at least 30 days before any such change in ownership or control of the Website and Your PII, and the possible changes to this Privacy Policy that could result.

Cookies

Cookies are bits of text that may be stored on Users' computers by their Web browsers for record-keeping purposes, such as to capture preferences. Cookies enable the Website to customize and enhance Users' experience while using the Website. Cookies may also enhance navigation by automatically performing certain functions and ensuring that Users do not see the same advertisement repeatedly. Because many consider the use of cookies to be an industry standard, many Web browser are set to accept cookies. If You would prefer *not* to receive cookies, however, You can alter the configuration of Your browser to refuse or delete cookies. If You choose to have your browser refuse or delete cookies, please understand that some areas of the Website may not function fully or properly when You view them.

Links to Social Media Pages & Other Websites

You should be aware that social media pages or third-party websites that may be accessed from the Website through hyperlinks or gateways (like banner advertisements) may themselves collect PII, are not controlled by the Website and are *not* subject to this Privacy Policy. Most such websites or social media pages have their own privacy policies and we suggest that you check those in order to understand how the proprietors of social media pages or third-party sites may use your PII.

Security & Protection

The Website employs industry standard security measures to protect against the loss, misuse, and alteration of information under the Website's control. Although we have undertaken to create a secure and reliable Website, You should understand that the confidentiality of any communication or material or information provided to or through the Website cannot be guaranteed. Accordingly, You should consider carefully whether to submit sensitive information to the Website. We urge you to take every appropriate precaution to protect your PII when on-line.

Consenting or "Opting Out" of Data Collection & Use

You can decide to provide various types of information, including PII, to the Website when requested (i.e., "opt in") or simply decline to provide it. For example, if the Website conducts a survey, You do not have participate unless You agree to do so. If our collection or use of certain PII relies on Your consent, we will try to ask for such consent clearly and



plainly and You may choose to give such consent or not, or give it and then later change Your mind and withdraw it. (See "Requesting, Updating, Deleting Information & Withdrawing Consent," below.) The Website also provides You with the opportunity to decline (i.e., "opt out" of) certain Website business practices or activities where Your PII might be used. For example, Users may opt out of activities like having the Website use their PII in order to include them in mailings (hard copy) or newsletters or other communications sent by the Website.

Requesting, Updating, Deleting Information & Withdrawing Consent

The Website will retain Your PII for as long as necessary to fulfill the purpose(s) for which it was collected and to comply with applicable laws. You may contact the Website at any time (including by the means described under "Questions," below) to request a copy of, review, update, correct or delete information that You provided to the Website or to withdraw any consent related thereto that You previously gave. You should, of course, be aware that the collection and use of certain information, including PII, may be necessary in order to provide certain information and services through the Website, and the deletion of such information (such as an email address) may preclude a particular service or the Website's ability to provide same to You.

Age Limit

The Website is intended for use only by individuals who are at least 18 years of age and we do not knowingly solicit or accept PII from minors or send them requests for information.

Questions

If You have any questions about this Privacy Policy, the information collection, use and dissemination practices of the Website, including Your PII, or withdrawal of Your consent regarding the foregoing, You can contact the Website and its employee(s) responsible for this Privacy Policy and related matters by email at Lauren.Byers@MarshBerry.com, by phone at 440.392.6546, or by U.S. mail at 28601 Chagrin Blvd., Suite 400, Woodmere, Ohio 44060.

Users who are California residents are entitled under California Civil Code Section § 1798.83 to request certain information regarding our disclosure of PII to third parties for their direct marketing purposes. To make such a request, please feel free to contact us as indicated above.



MarshBerry Capital, Inc. Privacy Policy and Complaint Notification

MarshBerry Capital, Inc.'s ("MarshBerry Capital") relationship with you is based on trust, and protecting the privacy of your personal information is a high priority for us. "Non-Public Information" is information received by MarshBerry Capital that identifies you, your business entity, and any personal or business assets. The following policies apply to consumers who are present or former clients of MarshBerry Capital.

1. MarshBerry Capital collects personal and business information in order to provide a high level of service. MarshBerry Capital does not sell your information to anyone, under any circumstances.
2. Unless you have specifically authorized MarshBerry Capital to do so, MarshBerry Capital does not disclose your non-public information to others except in three limited circumstances.
 - ◆ MarshBerry Capital may from time to time share client information with our Parent company, Marsh, Berry & Company, Inc.
 - Due to the nature of our organization, MarshBerry Capital does share resources and office space with our Parent company and affiliated Registered Investment Advisor. While MarshBerry Capital has implemented procedures to limit your personal and business information to only those employees that need to know such information to provide you services, in the normal course of business, non-MarshBerry Capital employees may come into contact with your personal information.
 - The Parent company of MarshBerry Capital, Marsh, Berry & Company, Inc., provides non-securities related consulting services to customers in the same industry as clients of MarshBerry Capital, Inc. In relation to its Parent Company's consulting practice, MarshBerry Capital may provide certain financial and operational information, once a transaction has been completed, to our Parent company so they can aggregate the data with others in order to formulate various benchmarking statistics.

Please note, employees of the Parent company may unknowingly solicit MarshBerry Capital clients for other services. However, MarshBerry Capital typically does not proactively provide information to the Parent company related to its clients for purposes of contacting you regarding the Parent company's consulting services.

- ◆ MarshBerry Capital discloses non-public information to co-advisers, brokers and other agents that help us process your transactions, such as vendors providing administrative services, ESOP consulting services, marketing services, data processing or computer software maintenance and development. These co-advisers, brokers, and vendors or other agents, are required to sign a non-disclosure agreement agreeing to maintain the confidentiality of non-public information. These entities are required to have policies and procedures in place to protect your confidential information.



- ◆ MarshBerry Capital may also disclose non-public information if MarshBerry Capital believes in good faith that such disclosure is required to comply with applicable laws, such as cooperating with regulators, or to comply with court orders.

For example, in order 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 person who opens an account. So, when you begin a relationship with us, MarshBerry Capital will ask for name, address, date of birth, date of incorporation and/or other information that will allow us to identify you and/or your business. MarshBerry Capital may also ask to see your passport, driver's license, or other identifying documents.

3. MarshBerry Capital collects information from you using due diligence lists, verbal requests, or other means determined by you or MarshBerry Capital. The information we collect may include name, address, telephone and facsimile numbers, email addresses, and Social Security number or tax identification number, among other documents.
4. MarshBerry Capital internally safeguards your non-public information by restricting access to only those individuals associated with MarshBerry Capital that provide products or services to you or to those who need access to your information to service your transactions. In addition, MarshBerry Capital maintains physical, electronic and procedural safeguards that meet applicable legal standards to protect your non-public information. MarshBerry Capital does not share information with any affiliated entities, except in the limited instances noted above in Item #2, and unless necessary to do so in order to service your transaction.
5. If at any time in the future it is necessary for MarshBerry Capital to disclose any of your information in a manner inconsistent with this privacy policy statement, MarshBerry Capital will give you advance notice of the proposed change so that you will have any opportunity to "opt out" of such disclosure.

For more information-If you have questions about MarshBerry Capital's Privacy Policy please direct written correspondence to *28601 Chagrin Blvd., Suite 400, Woodmere, Ohio 44122.*

In the event you have a complaint, please direct written correspondence to the Compliance Department at, *28601 Chagrin Blvd., Suite 400, Woodmere, Ohio 44122.*

November 06, 2018