

## **Folla Capital, LLC Protects your Privacy and Inbox. What does this mean?**

At Folla Capital, we take your privacy seriously:

- We only send you email **if you give us permission** to do so (by subscribing to our mailing list). **We respect your permission.**
- We only send you email that is **related to what you subscribed to** and why you subscribed.
- We abide by the rules and anti-spam laws set forth by **CAN-SPAM.**
- You can **unsubscribe whenever you want** with a click of your mouse.

## **Folla Capital, LLC Privacy Notice**

**Effective Date: January 1, 2024**

This privacy notice discloses the privacy practices for follacapital.com owned and operated by Folla Capital, LLC. This privacy notice applies solely to information collected by this website **www.follacapital.com** and the Folla Capital platform. It will notify you of the following:

1. What personally identifiable information is collected from you through the website, how it is used, and with whom it may be shared.
2. What choices are available to you regarding the use of your data.
3. The security procedures in place to protect the misuse of your information.
4. How you can correct any inaccuracies in the information.

If you have questions or complaints regarding our privacy policy or practices, please contact us at **cfranklin@follacapital.com.**

### **Information Collection, Use, and Sharing**

We are the sole owners of the information collected on this site. We only have access to/collect information that you voluntarily give us via email or other direct contact from you. We collect the following personal information from you such as name, email address, mailing address, phone number, and job title. We will not sell or rent this information to anyone.

We will use your information to respond to you, regarding the reason you contacted us, for example, to schedule a product tour, send you requested product or service information, respond to customer service requests, send you marketing communications, send you a newsletter, and to provide our services to you. We will not share your information with any third party outside of our organization, other than as necessary to fulfill your request or as described in this privacy notice.

Unless you ask us not to, we may contact you via email in the future to tell you about specials, new products or services, or changes to this privacy policy. If you wish to unsubscribe from marketing or newsletter emails, please follow the unsubscribe directions in these emails.

We may provide your personal information to companies that provide services to help us with our business activities, such as our email service provider or hosting provider. These companies are authorized to use your personal information, only as necessary, to provide these services to us.

Legal Disclaimer - We may also disclose your personal information, as required by law, such as to comply with a subpoena, or similar legal process when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request, to any other third party with your prior consent to do so.

If Folla Capital is involved in a merger, acquisition, or sale of all or a portion of its assets, you will be notified via email and/or a prominent notice on our website of any change in ownership or uses of your personal information, as well as any choices you may have regarding your personal information.

### **Your Access to and Control Over Information**

You may opt out of any future contacts from us at any time. You can do the following at any time by contacting us at [\*\*cfranklin@follacapital.com\*\*](mailto:cfranklin@follacapital.com):

- See what data we have about you, if any.
- Change/correct any data we have about you.
- Have us delete any data we have about you.
- Express any concern you have about our use of your data.

Any requests for access to information will be answered within thirty (30) days. We will retain your information for as long as your account is active or as needed to provide you services. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

### **Tracking Technologies/Cookies**

A cookie is a small text file that is stored on a user's computer for record-keeping purposes. We use cookies on this site. We link the information we store in cookies to any personally identifiable information you submit while on our site. We use both session ID cookies and persistent cookies. A session ID cookie expires when you close your browser. A persistent cookie remains on your hard drive for an extended period of time. We use cookies for personalization and tracking. You can remove persistent cookies by following directions provided in your internet browser's "help" directory. To learn more about cookies, please visit [\*\*http://www.webopedia.com/TERM/C/cookie.html\*\*](http://www.webopedia.com/TERM/C/cookie.html). If you reject cookies, you may still use our site, but your ability to use some areas of our site, such as logging into our site will be limited.

- Analytics / Log Files

As is true of most websites, we gather certain information automatically and store it in log files. This information includes internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and clickstream data.

We use this information, which does not identify individual users, to analyze trends, to administer the site, to track users' movements around the site and to gather demographic information about our user base as a whole.

We do link this automatically collected data to personally identifiable information. IP addresses are tied to personally identifiable information to provide general statistics regarding use of our site.

- 3rd Party Tracking

The use of cookies by our partners, affiliates, tracking utility company, service providers is not covered by our privacy statement. We do not have access or control over these cookies. Our partners, affiliates, tracking utility company, service providers use session ID cookies to make it easier for you to navigate our site. Our third-party partners employ clear gifs (a.k.a. Web Beacons/Web Bugs), images, and scripts that help them better manage content on our site.

## **Security**

We take precautions to protect your information. When you submit sensitive information via the website and through our platform, your information is protected both online and offline.

All data in motion over public networks is encrypted and transmitted to us in a secure way. You can verify this by looking for a closed lock icon at the bottom of your web browser or looking for "https" at the beginning of the address of the web page. However, no method of transmission over the internet, or method of electronic storage, is 100% secure. Therefore, we cannot guarantee its absolute security. If you have any questions about security on our website, please contact us with our information below.

While we use encryption to protect all data transmitted online, we also protect your information offline. Only employees who need the information to perform a specific job (for example, billing or customer service) are granted access to personally identifiable information. The computers/servers in which we store personally identifiable information are kept in a secure environment.

## **Information Related to Data Collected through the Folla Capital Platform**

Folla Capital collects information under the direction of its Clients, and has no direct relationship with the individuals whose personal data it processes.

**Client Data** - Data and information provided or created by our clients in the course of using our products or services ("Client Data") remains the property of our client and is not used or

disclosed by us except as reasonably required to provide our products or services, or as otherwise set out in this Policy.

**Choice** - We collect information for our clients, if you are a customer of one of our clients and would no longer like to be contacted by one of our clients that use our service, please contact the client that you interact with directly.

**Service Provider, Sub-Processors/Onward Transfer** - Folla Capital may transfer personal information to companies that help us provide our service. Transfers to subsequent third parties are covered by the provisions in this policy regarding notice and choice and the service agreements with our clients.

**Access to Data Controlled by our Clients** - Folla Capital has no direct relationship with the individuals whose personal data it processes. An individual who seeks access, or who seeks to correct, amend, or delete inaccurate data should direct his query to Folla Capital's Client (the data controller). If the client requests Folla Capital to remove the data, we will respond to their request within thirty (30) business days.

**Data Retention** - Folla Capital will retain personal data we process on behalf of our clients for as long as needed to provide services to our Client. Folla Capital will retain and use this personal information, as necessary, to comply with our legal obligations, resolve disputes, and enforce our agreements.

### **Additional Information**

**Links to 3rd Party Sites** - Our site includes links to other websites whose privacy practices may differ from those of Folla Capital. If you submit personal information to any of those sites, your information is governed by their privacy policies. We encourage you to carefully read the privacy policy of any website you visit.

**Blog/Forum** - Folla Capital offers publicly accessible blogs or community forums. You should be aware that any information you provide in these areas may be read, collected, and used by others who access them. To request removal of your personal information from our blog or community forum, please contact us at [\*\*cfranklin@follacapital.com\*\*](mailto:cfranklin@follacapital.com). In some cases, we may not be able to remove your personal information, in which case we will let you know if we are unable to do so and why.

**Social Media Widgets** - Our website includes social media features, such as the Facebook Like button and widgets, such as the ShareThis button or interactive mini-programs that run on our site. These features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the feature to function properly. Social media features and widgets are either hosted by a third party or hosted directly on our website. Your interactions with these features are governed by the privacy policy of the company providing it.

**Changes to this Policy** - We may update this privacy policy to reflect changes to our information practices. If we make any material changes, we will notify you by email or by means

of a notice on this site prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

**If you feel that we are not abiding by this privacy policy, you should contact us immediately at [cfranklin@follacapital.com](mailto:cfranklin@follacapital.com).**

**Official correspondence/ mailing address:**

Folla Capital, LLC  
ATTN: Chief Compliance Officer  
3722 Shipyard Boulevard, Suite E  
Wilmington, NC 28403  
USA