

PRIVACY POLICY

This privacy policy explains how Stonegate Advisors, LLC (“Stonegate”) and STAMP (collectively “STAMP” and commonly referred to as “we” and “us”) collects, uses, shares and protects information obtained from registered users (“Users”), customers, clients and visitors (collectively, the “STAMP Users”) to its websites (each, a “Site” and collectively, the “Sites”). You can obtain details of our group companies by writing to us at the address given in the “Contact” section of this policy.

If you are a STAMP User, you have agreed and are additionally subject to the Agreement Between User and STAMP (“Terms & Conditions”), which expressly incorporates this Privacy Policy. If you are not a STAMP User, by visiting the Sites you consent to the collection, use and transfer of your information under the terms of this privacy policy.

We will never rent or sell your personally identifiable information to third parties for marketing purposes

We will never share your contact information with another STAMP User or third party, without your consent.

Any sensitive information that you provide will be secured with all industry standard protocols and technology

Notice of all changes that materially affect ways in which your personally identifiable data may be used or shared will be posted in updates to our Privacy Statement. If you continue to use STAMP after notice of changes have been sent to you or published on our site, you hereby provide your consent to the changed practices.

Please read this privacy policy to learn more about:

- What personally identifiable information of yours is collected by STAMP.
- How the information is used.
- With whom the information may be shared.
- How you can access and change your account information.
- What security procedures are in place to protect the loss, misuse or alteration of information collected by STAMP.
- How to contact us.

Personal Information and Data We Collect

STAMP collects information that you voluntarily provide to us on the Sites by phone, by email, by template upload, and otherwise, including usernames, contact details, and user permission levels.

STAMP may send “cookies” to your computer when you visit the Sites. Cookies, which are small files that are stored on your computer, make it easier for you to log on to and use the Sites during

future visits. Cookies also allow us to monitor website traffic and to personalize the content of the Sites for you. If you like, you can set your browser to notify you before you receive a cookie so you have the chance to accept it, and you can also set your browser to turn off all cookies. The website www.allaboutcookies.org (run by the Interactive Advertising Bureau) contains step-by-step guidance on how cookies can be switched off by users.

STAMP servers automatically record information when you visit our Sites. These servers' logs include information such as your web request and Internet Protocol address

Use of Your Information

We may use your information to process and administer details of your subscription and to keep you up to date with new developments at STAMP. We also use and analyze the information we collect so that we can administer, support, improve and develop our business.

We do not sell or share your personal information obtained through our Sites with third parties for their marketing purposes. STAMP and trusted third parties process personal information only for the purposes for which it was collected.

STAMP may contact you using personal information you voluntarily provide. In particular, we may contact users or customers about specific STAMP projects, assessments, and campaigns.

Disclosure of Your Information

Information that you provide to us will be held by us in the United States and may be held and accessed by our staff and third parties working for us or for our subsidiaries and affiliates inside and outside the United States for the purposes set out in this policy or for other purposes approved by you. Your information may be held, processed and transferred among Stonegate, STAMP and related companies. Please write to us at the address given in the "Contact" section of this policy for a full list of the Stonegate companies.

Stonegate may disclose your information in response to legal process, if necessary, to protect our rights and the rights of other Stonegate companies, as otherwise required by law, or for the prevention or detection of a crime.

Accessing & Updating Your Information

You are entitled to see the personal information held about you. You may also request that we make changes to your personal information so that it is accurate and kept up to date, and we may update your information using data obtained from you.

Information Collection

Registration:

There are several types of users of this Site including customers, clients, and other visitors (the

“STAMP Users”). You must register to be eligible to become a STAMP user. In order to become a STAMP user, you must first create an account on this site, or have Stonegate create an account on your behalf, and comply with the terms of the Terms of Use understand the terms of the Privacy Policy. To create an account, you are required to provide the following minimum level of contact information: name, email address, country, ZIP/postal code, set permission and access levels, and choose a user name and password (referred to as a “User Profile” or “Profile”).

Information About Your Clients:

In order to invite others to provide feedback on you or your company directly in STAMP, you will enter, either directly in to the system or template upload, their name, title, company, email address and other relevant profile and contact information. This information will be used by STAMP to send your invitation to participate in an assessment including a message that you write. The names and email addresses of people that you invite will be used only to send your invitation and reminders.

All information that you enter or upload about your contacts will be covered by the same terms of this privacy policy as cover your own personally identifiable information.

Information Use

STAMP Communications:

STAMP will communicate with you through email and notices posted on this website. These include a series of welcome emails which help inform Users about various features of STAMP. Please be aware that you will always receive certain emails from STAMP related to the proper functioning of your account, including but not limited to, email notices when an assessment is completed, when reports are available, information about User accounts, and assessment status.

Information Sharing

Sharing Information With Third Parties:

STAMP takes the privacy of our users very seriously. We will **never** sell, rent, or otherwise provide your personally identifiable information to any third parties for marketing purposes. We will only share your personally identifiable information with third parties to carry out your instructions and to provide specific services.

We may provide aggregated data about the usage of our services to third-parties for such purposes as we deem, in our sole discretion, to be appropriate. We may segment Registered STAMP Users by such categories as role (i.e. product managers, vice presidents), industry, geographic location, or company. If you would like to be excluded from the aggregated research or products based upon aggregated data about STAMP Users’ activities on the site, please email customer service.

Legal Disclaimer:

It is possible that we may need to disclose personal information when required by law. We will disclose such information only when we have a good-faith belief that it is necessary to comply with a court order, ongoing judicial proceeding, or other legal process served on our company or to exercise our legal rights or defend against legal claims.

You agree to indemnify, defend, and hold harmless Stonegate, its members, managers, officers, directors, employees, agents, attorneys, licensors and suppliers (collectively the "Provider") from and against all losses, expenses, damages and costs, including reasonable attorneys' fees, resulting from any violation of this Privacy Statement or any activity related to your Internet account (including negligent or wrongful conduct), by you or any other person accessing the Site using your User account.

In order to secure your personal information, access to your data on STAMP is password-protected, and sensitive data is protected by SSL encryption when it is exchanged between your web browser and our web site. To protect any data you store on our servers we also regularly audit our system for possible vulnerabilities and attacks and we use a tier-one secured-access data center.

Sale of STAMP

Stonegate reserves the right to share or transfer personally identifiable information and aggregate information to a third party in the event of a sale, merger, acquisition or other transaction (collectively referred to as "Transaction") by and between Stonegate and a third party, provided such third party agrees to adhere to the terms of this Privacy Statement. Moreover, prior to a Transaction between Stonegate and a third party, Users will be notified of their ability to delete their user profile prior to the Transaction and will have 30 days to "opt out" of disclosing their information. Failure to so "opt out" will allow Stonegate to disclose such personal information in the context of this transaction.

Data Integrity and Access

Should a user find inaccuracies in such user's information, or desire to close an account or view the personally identifiable information STAMP may have regarding the user, the user may contact STAMP through the communication methods described below, or when technically feasible, directly on a Site. STAMP will make commercially reasonable efforts to respond to requests for access within thirty (30) days of receiving requests. STAMP may decline to process users' access or update requests to their personally identifiable information if the requests require disproportionate technical effort, jeopardize the privacy of other users, or are impractical (for instance, requests concerning information residing on backup tapes).

Security

To prevent unauthorized access or disclosure, maintain data accuracy, and ensure the appropriate use of information, STAMP implements physical, electronic, and managerial procedures to safeguard and secure the information STAMP collects. STAMP uses encryption when collecting or transferring sensitive personally identifiable information. However, STAMP does not guarantee

that unauthorized third parties will never defeat measures taken to prevent improper use of personally identifiable information.

Internal STAMP access to users' nonpublic personally identifiable information is restricted to STAMP's administrators and individuals on a need-to-know basis. These individuals are bound by confidentiality agreements.

User passwords are keys to accounts. Use unique numbers, letters, and special characters for passwords and do not disclose passwords to other people in order to prevent loss of account control. Users are responsible for all actions taken in their accounts. Notify STAMP of any password compromises, and change passwords periodically to maintain account protection.

Enforcement

In the event STAMP becomes aware that the security of a Site has been compromised or STAMP Users' personally identifiable information has been disclosed to unrelated third parties as a result of external activity, including but not limited to security attacks or fraud, STAMP reserves the right to take reasonable appropriate measures, including but not limited to, investigation and reporting, and notification to and cooperation with law enforcement authorities.

If STAMP becomes aware that STAMP Users' personally identifiable information has been disclosed in a manner not permitted by this Privacy Statement, STAMP will make reasonable efforts to notify the affected user, as soon as reasonably possible and as permitted by law, of what information has been disclosed, to the extent that STAMP knows this information.

Changes to this Privacy Policy

STAMP may update this privacy policy. In the event there are significant changes in the way we treat your personally identifiable information, we will display a notice on this site. Unless stated otherwise, our current Privacy Policy applies to all information that we have about you and your account.

Questions or Comments

If you have questions or comments about this privacy policy, please email us at info@stonegateadvisors.com or contact us at:

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