



Effective Date: March 8, 2023

PRIVACY POLICY

CFI Partners, LLC (“Company”) is committed to protecting the privacy of users of the website www.cfipartners.com (the “Website”). This Privacy Policy describes how Company gathers and uses information about visitors to our Website (“Visitors”). This Privacy Policy applies solely to the information that we collect through the Website. This Privacy Policy does not address personal information that you provide to us in other contexts (*e.g.*, through a business relationship not handled through the Website). This Website is solely directed to, and intended for, Company’s business customers, and not for individuals.

Acceptance of Privacy Policy

By using the Website, you signify your acceptance of this Privacy Policy. If you do not agree to the terms of this Privacy Policy, please do not use the Website. Your continued use of the Website following the posting of changes to these terms will mean that you accept those changes.

How Do We Collect Your Personal Information?

Information You Provide. You may visit our Website without telling us anything about yourself. If you contact us and choose to provide personally identifiable information (“Personal Information”), such as your email address or mailing address when you submit a question or request through our “Contact” page, we will use that information and may share it with other companies and/or individuals (*e.g.*, our partners, consultants, and service providers) for the purpose for which you submitted it to us.

Domain Information. From time to time, our Website may be configured to collect domain information. This data enables us to become more familiar with which users visit our site, how often they visit and what parts of the site they visit most often. Company uses this information to improve our Website. No personally identifiable information is gathered in this process. This information is collected automatically and requires no action on your part.

How Do We Use Your Personal Information?

If you choose to provide us with Personal Information by completing a form on the Website or emailing us, we will use that Personal Information to (i) operate the Website, (ii) respond to your question or request, (iii) communicate with you about our products or services via email, (iv) send information to you, and (v) notify you of changes to this Privacy Policy.

Do We Disclose Any Personal Information to Outside Parties?

Unless you expressly give us permission in writing to do so, Company will not sell, rent, license, or trade your Personal Information other than as specified in this Privacy Policy.

Disclosures to Third Parties Assisting In Our Operations. Company may share your Personal Information under confidentiality agreements with other companies that work with, or on behalf of, Company to provide products and services. These companies may use your Personal Information to assist Company in its operations. However, these companies do not have any independent right to share this information.

Disclosures Under Special Circumstances. We may provide information about you to respond to subpoenas, court orders, legal process or governmental regulations, or to establish or exercise our legal rights or defend against legal claims. We believe it is necessary to share information in order to investigate, prevent or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, or as otherwise required by law. In such circumstances, we will take appropriate measures to ensure that the requester understands the sensitive nature of the Personal Information that they may receive.

Business Transfers. We may share your Personal Information with other business entities in connection with the sale, assignment, merger or other transfer of all or a portion of Company's business to such business entity. We will require any such successor business entity to honor the terms of this Privacy Policy.

Automatically Collected Information and Anonymous Information

Each time a Visitor comes to the Website, Company collects some information to improve the overall quality of the Visitor's online experience.

Aggregated Data. Company collects aggregate queries for internal reporting and also counts, tracks, and aggregates the Visitor's activity into Company's analysis of general traffic-flow at the Website. To these ends, Company may merge information about you into aggregated group data. In some cases, Company may remove personal identifiers from Personal Information and maintain it in aggregate form that may later be combined with other information to generate anonymous, aggregated statistical information. Such anonymous, group data may be shared on an aggregated basis with Company's affiliates, business partners, service providers and/or vendors; if it does so, Company will not disclose your individual identity.

Web Server Logs and IP Addresses. An Internet Protocol ("IP") address is a number that automatically identifies the computer or device you have used to access the Internet. The IP address enables our server to send you the web pages that you want to visit, and it may disclose the server owned by your Internet Service Provider. Company may use IP addresses to conduct Website analyses and performance reviews and to administer the Website.

Cookies and Web Beacons. Periodically, some pages on this Website may use “cookies,” which are small files that the site places on your hard drive for identification purposes. These files are used for site registration and customization the next time you visit us. You should note that cookies cannot read data off of your hard drive. Your web browser may allow you to be notified when you are receiving a cookie, giving you the choice to accept it or not. You can also refuse all cookies by turning them off in your browser. By not accepting cookies, some pages may not fully function and you may not be able to access certain information on this Website. Information that we collect through cookies includes (i) the name and version of the operating system on the Visitor’s computer, (ii) the name and version of the Visitor’s browser, (iii) which page on the Site the Visitor is currently reading, as well as clicks and time spent on a particular page, (iv) if the Visitor was sent to the current page by some other page on the web, the universal resource locator (“URL”) of the referring web page, and (v) geolocation of the Visitor’s computer or device. Some of the Site’s web pages may use web beacons in conjunction with cookies to compile aggregate statistics about Site usage. A web beacon is an electronic image (also referred to as an “action tag,” “single-pixel,” or “clear GIF”) that is commonly used to track the traffic patterns of users from one web page to another in order to maximize web traffic flow and to otherwise analyze the effectiveness of the Website. Some web beacons may be unusable if you elect to reject their associated cookies.

Security

The security of your data is very important to Company. We have implemented appropriate security measures preventing your Personal Information from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. However, you should know that no website operator, including Company, can fully eliminate security risks associated with Personal Information. While Company has endeavored to create a secure and reliable website for users, the confidentiality of any communication or material transmitted to/from the Website or via e-mail cannot be guaranteed.

Children's Privacy Protection

Under Age 13

Company understands the importance of protecting children's privacy in the interactive online world. The Website is not designed for, or intentionally targeted at, children under 13 years of age. It is not our policy to intentionally collect or maintain information about anyone under the age of 13. No one under the age of 13 should submit any Personal Information to Company or the Website.

Under Age 18

Minors under 18 years of age may have the Personal Information that they have provide to Company through the Website deleted by sending an email to helpdesk@cfipartners.com requesting deletion. Please note that, while we make reasonable efforts to comply with such requests, deletion of your personal information does not ensure complete and comprehensive removal of that data from all systems.

Response to “Do Not Track” Signals

Some Internet browsers include the ability to transmit “Do Not Track” signals. Since uniform standards for “Do Not Track” signals have not yet been adopted, Company does not process or respond to “Do Not Track” signals.

Updating Your Information

If you wish to stop receiving e-mails or other communications from us, or if you have submitted Personal Information through our Website and would like that information deleted from our records, please notify us at helpdesk@cfipartners.com.

Links to Third Party Websites

As a convenience to our Visitors, this Website may contain links to other sites that we believe may offer useful information. As stated in more detail in the Website Terms of Service, the terms of usage and other conditions of use posted on those sites, and not the policies and procedures we described here, apply to those sites. Your linking to any other websites is at your own risk, and you are responsible for learning about and complying with the terms of usage and other conditions posted on those websites.

Changes to this Privacy Policy

This Privacy Policy may be revised from time to time as we add new features and services, as laws change, and as industry privacy and security best practices evolve. We display an effective date on the policy in the upper right corner of this Privacy Policy so that it will be easier for you to know when there has been a change. If we make any change to this Privacy Policy regarding use or disclosure of Personal Information, we will provide advance notice on the Website. Small changes or changes that do not significantly affect individual privacy interests may be made at any time and without prior notice.

For Additional Information

If you have any questions about this Privacy Policy, the practices of this Website, or your dealings with this Website, please contact the Chief Compliance Officer, Joe Sommer: JSommer@cfipartners.com.