

Rincon Partners, LLC Privacy Policy

Introduction

Rincon Partners, LLC ("Rincon", "us", "our" or "we") respects your privacy and is committed to protecting it through our compliance with this policy ("Privacy Policy").

This Privacy Policy describes the personal information Rincon collects about you, and how we use and share that information. This policy applies to personal information we collect when you sign up for Rincon; access or use our website, products, or services (collectively, the "Services"); or when you otherwise interact with us, including through e-mail, text and other electronic messages. It does not apply to information collected by (i) us offline or through any other means, or (ii) any third party, including through any application or content (including advertising) that may link to or be accessible from our Services.

This Privacy Policy refers to personal information which is information that can be associated with a specific person and used to identify that person. Personal information does not include information that has been anonymized so that it does not identify a specific user.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Services. By accessing or using our Services, you agree to this Privacy Policy.

Updates to the Privacy Policy

We may update, amend, revise or otherwise change this Privacy Policy from time to time. If we make changes, we will notify you by posting the updated policy and revising the "Effective Date" at the end of this Privacy Policy. Your continued use of the Services constitutes your acceptance of the then-effective Privacy Policy.

Sources of Information About You

We obtain information about you from a variety of sources, including you, your interaction with Rincon, and third parties. Such information may include your name, postal address, e-mail address, and telephone number, among other personally identifiable information.

Information you provide to us: If you use certain Services, you may be required to provide us certain information.

- Information that you provide by filling in forms on our website. This includes information provided at the time of registering to use our Services, subscribing to our Service, posting material or requesting further services.

- We may also ask you for information when you report a problem with our Services.
- Records and copies of your correspondence (including e-mail addresses), if you contact us.
- Your responses to surveys that we might ask you to complete for research purposes.
- Details of transactions you carry out through our Services and of the fulfillment of your orders. You may be required to provide financial information before placing an order through our Services.
- Your search queries on our website or through our Services.

Information we collect from your use of the Services and other interactions you have with Rincon:

We may collect your usage information about how you use the Services, including your access times, location, browser types and language, and Internet Protocol addresses. We may collect device-specific information when you access our Services, including your hardware model, operating system and version, unique device identifiers, mobile network information, and information about the device's interaction with our Services.

The information we collect automatically is statistical data and may or may not include personal information, but we may maintain it or associate it with personal information we collect in other ways or receive from third parties. It helps us to improve and to deliver better and more personalized Services.

Information We Collect From Other Sources. We may also collect information about you from third parties, including but not limited to third-party verification services, credit bureaus, mailing list providers, and publicly available sources. This information may include your Social Security number.

Our Use of Information

We use information about you to provide, maintain, personalize and improve our Services and to deliver the information and support your requests, including receipts, technical notices, security alerts, and support and administrative messages.

We may use information we collect to send you news and information about our Services and to communicate with you about products, services, contests, promotions, incentives, and rewards offered by us and select partners. You may opt out of receiving promotional emails or text messages from Rincon by following the instructions in those emails or text messages. If you opt out, we may still send you non-promotional

communications, such as messages about your account or our ongoing business relations.

We may also use information about you (i) to track and analyze trends and usage in connection with our Services; (ii) to process and deliver contest and promotion entries and rewards; (iii) to protect our rights or property; (iv) to compare information for accuracy; (v) to verify your identity; (vi) to investigate and prevent fraud or other illegal activities; and (vii) for any other purpose disclosed to you in connection with our Services.

We may use third-party service providers to process and store personal information in the United States and other countries.

Sharing of Information

We may share personal information about you as follows:

- To our subsidiaries and affiliates.
- To contractors, service providers and other third parties we use to support our business and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of Rincon's assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which personal information held by Rincon about our users is among the assets transferred.
- To fulfill the purpose for which you provide it.
- With third parties that run advertising campaigns, contests, special offers, or other events or activities in connection with our Services.
- With your consent or direction.
- To comply with any court order, law or legal process, including to respond to any government or regulatory request.
- To enforce or apply our terms of service and other agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Rincon, our customers or others. This includes exchanging

information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

We may also share aggregated, non-personally identifiable information with third parties for any reason.

Security

We have implemented commercially reasonable measures, including administrative, technical, and physical safeguards, to help protect your personal information from loss, theft, misuse, unauthorized access, disclosure, alteration, and destruction.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to or through our Services. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on or within the Services.

Updating Information

You may update or correct information about yourself by emailing us at info@rinconpartners.com.

Links to Other Web Sites: Third Party Applications

Rincon is not responsible for any practices employed by websites linked to or from our website, nor their information or content. Please remember that when you use a link to go from our website to another website, this Privacy Policy is no longer in effect. Your browsing and interaction on any other website is subject to that website's own rules and policies. Please read over those rules and policies before proceeding.

Contact Information

Please contact us with any questions or concerns regarding our policy at this address: Rincon Partners, LLC, 11811 N. Tatum Blvd., Suite P-177, Phoenix, Arizona 85028, Attention: Legal, or email to info@rinconpartners.com.

Effective Date

The effective date of this policy is June 1, 2019.