

RINZLER CAPITAL LLC

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PRIVACY POLICY

Investment advisers are required by law to inform their clients of their policies regarding privacy of client information. We are bound by professional standards of confidentiality that are even more stringent than those required by law. Federal law gives the customer the right to limit some but not all sharing of personal information. It also requires us to tell you how we collect, share, and protect your personal information.

TYPES OF NONPUBLIC PERSONAL INFORMATION (NPI) WE COLLECT

We collect nonpublic personal information about you that is either provided to us by you or obtained by us with your authorization. This can include but is not limited to your Social Security Number, Date of Birth, Banking Information, Financial Account Numbers and/or Balances, Sources of Income, and Credit Card Numbers or Information. When you are no longer our customer, we may continue to share your information only as described in this notice.

PARTIES TO WHOM WE DISCLOSE INFORMATION

All Investment Advisers may need to share personal information to run their everyday business. In the section below, we list the reasons that we may share your personal information:

- ☐ For everyday business purposes – such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus;
- ☐ For our marketing – to offer our products and services to you;
- ☐ For joint marketing with other financial companies;
- ☐ For our affiliates' everyday business purposes – information about your transactions and experiences and information about your creditworthiness; or
- ☐ For non-affiliates to market to you.

If you are a new customer we may begin sharing your

information on the day you sign our agreement. When you are no longer our customer, we may continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.

PROTECTING CONFIDENTIALITY OF CURRENT AND FORMER CLIENT'S INFORMATION

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law, including computer safeguards and secured files and building.

FEDERAL LAW GIVES YOU THE RIGHT TO LIMIT SHARING – OPTING OUT

Federal law allows you the right to limit the sharing of your NPI by “opting-out” of the following: sharing for affiliates' everyday business purposes – information about your creditworthiness; or sharing with affiliates or non-affiliates who use your information to market to you. State laws and individual companies may give you additional rights to limit sharing. Please notify us immediately if you choose to opt out of these types of sharing.

DEFINITIONS: Affiliates – companies related by common ownership or control. They can be financial and non-financial companies; Non-affiliates – companies not related by common ownership or control. They can be financial and non-financial companies; Joint marketing – a formal agreement between non-affiliated financial companies that together market financial products or services to you.

Please call if you have any questions. Your privacy, our professional ethics, and the ability to provide you with quality financial services are very important to us.

Privacy Policy for texting

Welcome to our website. We value your privacy and are dedicated to protecting your personal data. This privacy policy outlines how we collect, use, store, and protect your personal data, and your rights concerning this data. We do not share your data with third parties for marketing or promotional purposes.

1. Data Sharing and Disclosure

We do not share your personal data with third parties for marketing or promotional purposes. We may share your data with third parties only in the following circumstances:

- Service Providers: With third-party service providers who perform functions on our behalf, such as IT service providers, data storage providers, and telecom service providers
- Legal Obligations: When required by law or to respond to legal processes.
- Protection: To protect our rights, property, and safety, or that of our customers and others.

2. Data We Collect

We collect various types of personal data, including:

- Identity Data: First and last name.
- Contact Data: Email address, phone number, billing and delivery address
- Technical Data: IP address, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform.
- Usage Data: Information about how you use our website, products, and services.
- Marketing and Communications Data: Your preferences in receiving marketing from us and your communication preferences.

3. Methods of Data Collection

We collect personal data using various methods, primarily through forms on our website:

- Direct Interactions: You provide your personal data when you fill out forms, create an account, subscribe to our services, request marketing materials, or give us feedback.
- Automated Technologies: As you interact with our website, we may automatically collect technical data about your equipment, browsing actions, and patterns. We collect this data using cookies, server logs, and other similar technologies

4. How We Use Your Personal Data

We use your personal data for the following purposes:

- SMS Program: If you opt into our SMS program, we will send you messages regarding our services, updates, policies, and promotional offers. You will receive messages about product updates, service notifications, and special offers. You can opt-out at any time.
- Service Provision: To perform the contract we are about to enter into or have entered into with you.
- Marketing and Communications: To send you marketing materials and communicate with you about our services.
- Prospecting: To analyze your data to understand your preferences and prospects for new clients.
- Customer Support: To respond to your inquiries and provide support.

5. Data Storage, Maintenance, and Protection

We implement appropriate security measures to protect your personal data from being accidentally lost, used, or accessed in an unauthorized way, altered, or disclosed. These measures include:

- Data Encryption: Encrypting personal data to protect it from unauthorized access.
- Access Controls: Limiting access to personal data to authorized personnel only.

- Regular Security Assessments: Conducting regular security assessments to identify and mitigate potential vulnerabilities.

6. Your Rights You have the following rights regarding your personal data:

- Access: You can request access to the personal data we hold about you.
- Correction: You can request correction of any incomplete or inaccurate data we hold about you.
- Erasure: You can request deletion of your personal data where there is no good reason for us to continue processing it.
- Objection: You can object to the processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation that makes you want to object to processing on this ground.
- Restriction: You can request restriction of processing of your personal data.

7. Opt-Out Options and Mobile Information

You have the right to opt out of receiving marketing communications from us at any time by:

- SMS: Replying "STOP" to any SMS message you receive from us. Email: Clicking the "unsubscribe" link in any email you receive from us.
- Account Settings: Updating your preferences in your account settings on our website.

More on mobile information usage, collection, and privacy

- Our SMS program provides updates, notifications, and promotional messages related to our services. By subscribing to our SMS program, you consent to receive SMS messages at the phone number provided. Message frequency may vary based on your interaction with our service.
- We do not share your mobile information with third parties or affiliates for marketing or promotional purposes. Additionally, all the categories of personal data mentioned above exclude text messaging originator opt-in data and consent. This information will not be shared with any third parties under any circumstances. However, we may share your data with trusted service providers who assist us in operating our SMS program, provided they agree to keep your data confidential and use it solely for the purpose of providing services on our behalf.
- You have the right to access, correct, verify, or remove your personal information at any time. To manage your information, please contact us at **610-716-7392**.
- Opt-Out Option: If you wish to opt-out of receiving SMS messages, you may do so at any time by replying "STOP" to any of our messages or by contacting us directly at **610-716-7392**. Opting out will not affect your other interactions with our services.

8. Changes to this Privacy Policy

We may change this Privacy Statement from time to time when necessary to reflect changes in our Services, how we use personal information, or the applicable law. If we make changes, we will revise the "Last Updated" date at the top of the statement. If we make material changes, we will provide you with notice or obtain consent regarding such changes as may be required by law. We encourage you to review the Privacy Statement whenever you access the Services or otherwise interact with us to stay informed about our privacy practices and the ways in which you can exercise choice over these practices. The practices described in this Privacy Statement are subject to applicable laws in the locations in which we operate.