

## **PRIVACY POLICY**

This Privacy Policy discloses the privacy practices for the [www.direct401k.com](http://www.direct401k.com) site and various related services (together referred to as the "site"). TEAM SCM ADVISORS INC., the provider of the site (referred to as "us " or "we"), is committed to protecting your privacy online. Please read the information below to learn the following regarding your use of this site.

You acknowledge that this Privacy Policy is part of any Site Terms of Use or posted policies on our site, and by accessing or using our site, you agree to be bound by all its terms and conditions. If you do not agree to these terms, please do not access, or use this site.

We reserve the right to change this Privacy Policy at any time. Such changes, modifications, additions, or deletions shall be effective immediately upon notice thereof, which may be given by means including, but not limited to issuing an E-mail to the E-mail address listed by registered users and posting the revised Policy on this page. You acknowledge and agree that it is your responsibility to maintain a valid E-mail address as a registered user, review this site and this Policy periodically and to be aware of any modifications. Your continued use of the site after such modifications will constitute your: (a) acknowledgment of the modified Policy; and (b) agreement to abide and be bound by the modified Policy.

### **1. Types of Information Collected**

To better provide you with our numerous services, we collect one types of information about our users on this site: Non-Personally Identifiable Information. Our primary goal in collecting information from you is to provide you with a smooth, efficient, and customized experience while using our site.

**Non-Personally Identifiable Information:** This refers to information that does not by itself identify a specific individual. We gather certain information about you based upon where you visit on our site in several ways. This information is compiled and analyzed on both a personal and an aggregated basis. This information may include the Web site's Uniform Resource Locator ("URL") that you just came from, which URL you next go to, what browser you are using, and your Internet Protocol ("IP") address. A URL is the global address of documents and other resources on the World Wide Web. An IP address is an identifier for a computer or device on a Transmission Control Protocol/Internet Protocol ("TCP/IP") network, such as the World Wide Web. Networks like the Web use the TCP/IP protocol to route information based on the IP address of the destination. In other words, an IP address is a number that is automatically assigned to your computer

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whenever you are surfing the web, allowing web servers to locate and identify your computer. Computers require IP addresses for users to communicate on the Internet.

We do not collect any Personally Identifiable Information about you unless you voluntarily provide it to us. Personally Identifiable Information is any information that we could use to identify an individual.

## **2. Collection Methods and Use of Information**

We may collect, or our third-party ad server and/or content server may collect, certain Non-Personally Identifiable Information. This information is ultimately stored in the form of store categories, and, in some cases, specific URLs. We use your IP address to diagnose problems with our servers, software, to administer our site and to gather demographic information. Our third-party ad servers will also provide us with summary, but not individual, reports that will tell us how many ads were presented and clicked upon at our site.

## **3. Release of Information**

We do not sell, trade, or rent your Information to others. We do provide some of our services through contractual arrangements with affiliates, services providers, partners and other third parties.

Occasionally we may be required by law enforcement or judicial authorities to provide Non-Personally Identifiable Information to the appropriate governmental authorities. We will disclose Non-Personally Identifiable Information upon receipt of a court order, subpoena, or to cooperate with a law enforcement investigation. We fully cooperate with law enforcement agencies in identifying those who use our services for illegal activities. We reserve the right to report to law enforcement agencies any activities that we in good faith believe to be unlawful.

We may also provide Non-Personally Identifiable Information about our customers' sales, traffic patterns, and related site information to third party advertisers, but these statistics do not include any Personally Identifiable Information.

## **4. User Choices on Collection and Use of Information**

You have choices with respect to cookies, as described below. By modifying your browser preferences, you have the choice to accept all cookies, to be notified when a cookie is set, or to reject all cookies. If you choose to reject all cookies some parts of our site may not work properly in your case.

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## 5. Cookies

When you use our site we will store cookies on your computer to facilitate and customize your use of our site. A cookie is a small data text file, which a Web site stores on your computer's hard drive (if your Web browser permits) that can later be retrieved to identify you to us. Our cookies store randomly assigned user identification numbers, the country where you are located, and your first name to welcome you back to our site. The cookies make your use of the site easier, make the site run more smoothly and help us to maintain a secure site. You are always free to decline our cookies if your browser permits, but some parts of our site may not work properly in that case.

We may use an outside ad serving company to display banner advertisements on our site. As part of their service, they will place a separate cookie on your computer. We will not provide any third-party ad server with any Personally Identifiable Information. We and our third-party ad server will collect and use Non-Personally Identifiable Information about you, such as your IP address, browser type, the server your computer is logged onto, the area code and zip code associated with your server and whether you responded to a particular ad. Other advertisers may also place banner ads on our site in the same manner as above, but we will not disclose any Personally Identifiable Information to them.

## 6. Privacy Policies of Third-Party Sites

Except as otherwise discussed in this Privacy Policy, this document only addresses the use and disclosure of information we collect from you. Other sites accessible through our site have their own privacy policies and data collection, use and disclosure practices. Please consult each site's privacy policy. We are not responsible for the policies or practices of third parties. Additionally, other companies which place advertising on our site may collect information about you when you view or click on their advertising using cookies. We cannot control this collection of information. You should contact these advertisers directly if you have any questions about their use of the information that they collect.

## 7. Controlling your Information.

**California Residents.** In accordance with the California Online Privacy Protection Act, we may collect Personal Information about your online activities when you use the Services. While we do not collect Personal Information, we do not respond to Web browsers' "do not track" signals. California's "Shine the Light" law, Civil Code Section 1798.83, permits our users who are California residents to periodically request and obtain certain information about any Personal Information disclosed to third parties for direct

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marketing purposes. If you are a California resident and wish to make such a request or if you wish for us to refrain from gathering your Personal Information, please submit your request in writing to the contact details set out in Section 8 below.

**EU Residents.** GDPR provides certain rights for EU residents. You may decline to share certain information with us, in which case we may not be able to provide some of the features and functionality of the Services. These rights include, in accordance with applicable law, the right to object to or request the restriction of processing of your information, and to request access to, rectification, erasure and portability of your own information. Where we process your information based on your consent, you have the right to withdraw that consent (noting that such withdrawal does not affect the lawfulness of any Processing performed prior to the date on which we receive notice of such withdrawal and does not prevent the Processing of your Personal Information in reliance upon any other available legal bases). Requests should be submitted by contacting us using the DSAR Portal. If you are an EU resident and have any unresolved privacy concern that we have not addressed satisfactorily after contacting us, you have the right to contact the appropriate EU Supervisory Authority and lodge a complaint.

## **8. Miscellaneous Privacy Issues**

You must be at least 18 years old to have our permission to use this site. Our policy is that we do not knowingly collect, use, or disclose Personally Identifiable Information about visitors, including those that are under 18 years of age.

You should also be aware that when Personally Identifiable Information is voluntarily disclosed (i.e., your name, E-mail address, etc.) in the discussion forums or other public areas on this site, that information, along with any information disclosed in your communication, can be collected, and used by third parties and may result in unsolicited messages from third parties. Such activities are beyond our control and this Policy does not apply to such information. Any submissions to chat rooms or other public areas on this site are accepted with the understanding that they are accessible to all third parties. If you do not want your comments to be viewed by third parties, you are advised not to make any submissions. Ultimately, you are solely responsible for maintaining the secrecy of your password and/or account information. Please be careful and responsible whenever you are online.

If you have any questions about this Privacy Policy, the practices of this site, or your dealings with this site, please contact us by sending a letter to:

TEAM SCM ADVISORS INC.  
Attn: Privacy Compliance Officer  
TEAM SCM ADVISORS INC.  
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495 Grand Blvd. Suite 206  
Miramar Beach, Florida 32550

You may also contact us by E-mail at [team@direct401k.com](mailto:team@direct401k.com)