

GENERAL DATA PROTECTION REGULATION - PRIVACY POLICY

The General Data Protection Regulation (GDPR) aims to protect the fundamental right to privacy and the protection of personal data of European Union (EU) citizens. This regulation affects any entity (including websites) that processes EU citizens' personal data. As part of the new regulation, Arlington Capital Services, LLC ("ACS") will inform you on how we collect, store, and use your data.

For the purpose of this Regulation the following are key definitions:

What is personal data? Any kind of information that be used to identity an individual, such as a name, an identification number, location data, or online identifier. It does not include data where the identity has been removed (Anonymous data).

What does 'processing' mean? Collecting, storing, using personal data.

Personal Information We Obtain

- Information provided by you on applications or other forms;
- Information regarding your transactions with us;
- Information from interactions that we have with you

Please note that providing personal information to us is voluntary on your part. If you choose not to provide us certain information, we may not be able to offer you our service.

How We Share Your Personal Information

We do not sell or otherwise disclosure personal information about you except as described here or at the time of the collection. ACS may share data in the following ways:

- To contact you in response to questions or when otherwise necessary;
- To complete transactions you have performed through ACS;
- To provide to ACS third party vendors and/or affiliates that enable us to complete transactions you have performed through ACS;
- To cooperate with legal or regulatory authorities or pursuant to a court order or subpoena; and
- To perform identity and address verification or enforce our legal rights.

Personal Information About Children

We do not knowingly collect or maintain personal information about children unless the personal information is provided by a parent, legal guardian or authorized adult. Our website is not intended for children. Visit the Federal Trade Commission website for more information on the <https://www.consumer.ftc.gov/articles/0031-protecting-your-childs-privacy-online>

Cookies

This website is hosted on the WordPress platform. We use cookies to support the operation of our website. Cookies are small amounts of data that a website sends to a web browser on a visitor's computer. Our cookies help us to collect information about visitors to our website, including data and time of visits, pages viewed, amount of time spent on our sites, or general information about the device used to access the site.

You can refuse or delete cookies. Most browsers and mobile devices offer their own settings to manage cookies. Please see www.aboutcookies.org for more information. If you refuse or delete a cookie, you may experience some inconvenience in your use of our website.

Confidentiality and Security

ACS restricts access to your personal information to those employees or vendors who need to know the information in order to provide service to you. ACS maintains physical, electronic and procedural safeguards to protect your personal information.

International Data Transfers

ACS may transfer your personal information abroad if required for the permitted purposes as described above. We will ensure that any such international transfers out of the European Economic Area (EEA) are made subject to appropriate or suitable safeguards as required by the General Data Protection Regulation (EU) 2016/679 ("GDPR") or other relevant laws.

Updating your Personal information

If any of the personal information that you have provided to us changes, for example if you change your email address or if you wish to cancel any request you have made of us, please let us know by contacting ACS at +1 205-488-4380.

How long do we retain your Personal information for?

We retain your personal information in an identifiable form in accordance with our internal policies, which establish general standards and procedures regarding the retention, handling and disposition of your personal information. Your personal information is retained for as long as necessary to meet legal, regulatory and business requirements. Retention periods may be extended if we are required to preserve your personal information in connection with litigation, investigations and proceedings.

Your Rights and Choices

If you are an EEA Individual you have a number of legal rights under GDPR in relation to the personal information that we hold about you. These rights include:

- Obtaining information regarding the processing of your personal information and access to the personal information that we hold about you. Please note that there may be circumstances in which we are entitled to refuse requests for access to copies of personal information. In particular, information that is subject to legal professional privilege;
- Requesting that we correct your personal information if it is inaccurate or incomplete;
- Requesting that we erase your personal information in certain circumstances. Please note that there may be circumstances where you ask us to erase your personal information but we are legally entitled to retain it;
- Objecting to, and requesting that we restrict, our processing of your personal information in certain circumstances. Again, there may be circumstances where you object to, or ask us to restrict, our processing of your personal information but we are legally entitled to refuse that request;
- Withdrawing your consent, although in certain circumstances it may be lawful for us to continue processing without your consent if we have another legitimate reason (other than consent) for doing so.

Contact

We have designated a Data Protection Officer (“DPO”) to enhance and promote compliance with and understanding of privacy and data protection principles. If you wish to do any of the above please send an email to gmurphy@arlingtoncapitaladvisors.com.

We may request that you prove your identity by providing us with a copy of a valid means of identification in order for us to comply with our security obligations and to prevent unauthorized disclosure

Last updated: April 14, 2020.