



Privacy Policy

Effective as of January 16, 2020

We at Avenue Global Advisors LLC ("AGA," "we," "us," or "our") have created this privacy policy (this "Privacy Policy") because we want you to know how information you provide to us is used and shared. This Privacy Policy relates to the information collection and use practices of AGA in connection with our mobile applications digital platforms, products, software, services, and websites (collectively, the "Service").

By accessing our Service, you are agreeing to the terms of this Privacy Policy and the accompanying Terms found [HERE](#). Capitalized terms not defined in this Privacy Policy shall have the meaning set forth in our Terms.

Scope of This Policy

The Service is operated by AGA in the United States (US), and complies with US law. If you are located outside of the US, please be aware that any information you provide to us may be transferred to, processed, maintained, and used on computers, servers, and systems located outside of your home country, where the data protection laws may not be as protective as those in your jurisdiction.

Information We Collect and How We Use It

In the course of operating the Service, we will collect (and/or receive) the following types of information. You authorize us to collect and/or receive such information.

Contact Information

We collect contact information from users (even those who are not account holders) who wish to, as applicable, obtain information or support, receive product and service offers from us and from our marketing partners, or purchase our products or services. Contact information typically includes your name, email address, and company name.

Use of the Service

In order to have full use of the Service, you must create an account via a login and password and submit an application. When submitting an application, you will be asked to provide certain personal information, such as your name, physical address, employment details, number of



AVENUE

dependents, tax identification number (or similar government identifier), and bank account details. This information is used to assess your financial situation and credit standing to allow use of the Service and facilitate proper account funding. Access to and review of such information is consented to in one or more Additional Agreements.

From Your Activity

In an ongoing effort to improve our Service, we automatically collect certain information regarding the activity of our users. This information includes the device from which you access the Service, your IP addresses, browser type and language, referring and exit pages and URLs, date and time, amount of time spent on particular pages, what sections of the Service you visit, and similar information concerning your use of the Service. We may also collect information about your device, such as the type of device, your Advertising Identifier (IDFA or AdID), operating system and version, carrier, and network type.

Geolocational Information

While you are using the Service on a mobile device, we may, with your consent, automatically collect geolocational information from your mobile device, wireless carrier, and/or certain third-party service providers. Such information is collectively called the "Geolocational Information." Collection of Geolocational Information occurs only when the Service is running on your mobile device. Although you may decline to allow us to collect Geolocational Information, if you decline, some of the functions and features of the Service may not be available to you on your mobile device.

From Cookies

Cookies are small packets of data that a web server stores on your computer's hard drive so that your computer will "remember" information about your visit. We may use both session cookies, which expire once you close your web browser, and persistent cookies, which stay on your computer until you delete them and other technologies to help us collect data and to enhance your experience with the Service. We may use cookies for various purposes, including, without limitation, to authenticate users, personalize your experience, analyze which portions of the Service are visited or used most frequently, and measure and optimize advertising and promotional effectiveness.

If you do not want us to place a cookie on your hard drive, you may be able to turn that feature off on your computer or mobile device. Please consult your Internet browser's documentation for information on how to do this. However, if you decide not to accept cookies from us, the Service may not function properly.



Third-Party Analytics

We may use one or more third-party analytics services (such as Google Analytics) to evaluate your use of the Service, to compile reports on activity (based on their collection of IP addresses, Internet service provider, browser type, operating system and language, referring and exit pages and URLs, data and time, amount of time spent on particular pages, what sections of the Service you visit, number of links clicked while on the Service, search terms and other similar usage data), and analyze performance metrics. These third parties use cookies and other technologies to help analyze and provide us the data. By accessing the Service, you consent, to the extent permitted under applicable law, to the processing of data about you by these analytics providers in the manner and for the purposes set out in this Privacy Policy. For more information on these third parties, including how to opt out from certain data collection, please visit the sites below.

Google Analytics: <https://www.google.com/analytics>

How we Use and Share Your Data

Aggregate Data

In an ongoing effort to better understand our users, we might analyze your information in aggregate form to operate, maintain, manage, and improve our Service. This aggregate information does not identify you personally. We may share this aggregate data with our affiliates, agents, and business partners. We may also disclose aggregated user statistics in order to describe our products and services to current and prospective business partners and to other third parties for other lawful purposes.

Sharing with Third Parties

We may engage other companies and individuals to perform certain business-related functions on our behalf. Examples may include providing technical assistance, customer service, financial services, and marketing assistance. These other companies will have access to the personal information only as necessary to perform their functions and to the extent permitted by law, and our contracts with all such third parties require them to protect the confidentiality of the Information we provide to them.

We may also share your personal information with any of our parent companies, subsidiaries, affiliates, or other companies under common control with us.



Business Transfers

In the event of a merger, dissolution or similar corporate event, or the sale of all or substantially all of our assets, we expect that the information that we have collected, including personal information, would be transferred to the surviving entity in a merger or the acquiring entity. All such transfers shall be subject to our commitments with respect to the privacy and confidentiality of such personal information as set forth in this Privacy Policy.

Disclosure to Public Authorities

We are required to disclose personal information in response to lawful requests by public authorities, including for the purpose of meeting national security or law enforcement requirements. We may also disclose personal information to other third parties when compelled to do so by government authorities or required by law or regulation including, but not limited to, in response to court orders and subpoenas.

Personal Information Rights

You have the right to access, correct, or amend your personal information by sending an email to us at customer@avenueglobaladvisors.com with “Privacy Policy” in the subject line or, as applicable, by logging into an account you have with us. Please allow us a reasonable time to respond to your request.

Opt Out for Direct Marketing

We will not share your information with non-affiliated third parties (i.e., parties that are not our parent companies, subsidiaries, joint ventures, or other companies under common control with us) that may use such information to market to you, without obtaining your opt-in consent. If you have opted-in for this kind of sharing, then you may: (i) choose to opt-out of such sharing by contacting us at customer@avenueglobaladvisors.com. or (ii) request certain information regarding our disclosure of such information to such non-affiliated third parties by contacting us at customer@avenueglobaladvisors.com.

If you would like to opt-out of AGA’s sharing of your information with our affiliates so that such affiliates can use your information to market to you, please contact us customer@avenueglobaladvisors.com



AVENUE

If you would like to opt-out of AGA's sharing of information about your creditworthiness with our affiliates for such affiliates' everyday business purposes, please contact us at customer@avenueglobaladvisors.com.

Accessing and Modifying Personal Information and Communication Preferences

If you have registered for the Service, you may access, review, and make changes to your personal information by following the instructions found on the Service. In addition, you may manage your receipt of marketing and non-transactional communications by clicking on the "unsubscribe" link located on the bottom of any AGA marketing email. Registered users cannot opt out of receiving transactional e-mails related to their account. We will use commercially reasonable efforts to process such requests in a timely manner. You should be aware, however, that it is not always possible to completely remove or modify information in our databases.

Retention of Personal Information

We will retain your personal information in a form that identifies you only for as long as it serves the purpose(s) for which it was initially collected as stated in this Privacy Policy, subsequently authorized, or as allowed under applicable law.

How We Protect Your Information

We take very seriously the security and privacy of the personal information that it collects pursuant to this Privacy Policy. Accordingly, we will implement reasonable and appropriate security measures to protect your personal information from loss, misuse and unauthorized access, disclosure, alteration and destruction, taking into account the risks involved in processing and the nature of such data, and comply with applicable laws and regulations.

External Websites

The Service may contain links to third party websites. AGA has no control over the privacy practices or the content of any of our business partners, advertisers, sponsors, or other websites to which we provide links. As such, we are not responsible for the content or the privacy policies of those third party websites. You should check the applicable third party privacy policy and terms of use when visiting any other websites.

Children



AVENUE

We do not knowingly collect personal information from children under the age of 13 through the Service. If you are under 13, please do not give us any personal information. We encourage parents and legal guardians to monitor their children's Internet usage and to help enforce our Privacy Policy by instructing their children to never provide personal information without their permission. If you have reason to believe that a child under the age of 13 has provided personal information to us, please contact us, and we will endeavor to delete that information from our databases.

California Residents

Under California Civil Code Section 1798.83, California residents who have an established business relationship with AGA may choose to opt out of our sharing your personal information with third parties for direct marketing purposes. If you are a California resident and (1) you wish to opt out; or (2) you wish to request certain information regarding our disclosure of your personal information to third parties for the direct marketing purposes, please send an e-mail to customer@avenueglobaladvisors.com.

In addition, AGA does not monitor, recognize, or honor any opt-out or do not track mechanisms, including general web browser "Do Not Track" settings and/or signals.

Changes to This Privacy Policy

This Privacy Policy is effective as of the date stated at the top of this Privacy Policy. We may change this Privacy Policy from time to time, and will post any changes on the Service or notify you via e-mail, at our option, as soon as they go into effect. By using the Service after we make any such changes to this Privacy Policy, you are deemed to have accepted such changes. Please refer back to this Privacy Policy on a regular basis.

Language Disclaimer

This Privacy Policy is presented in English and Spanish. Spanish version is presented merely for reference. In case of any inconsistency between English and Spanish versions, English version shall prevail for all purposes.

How to Contact Us

If you have questions about this Privacy Policy, please e-mail us at customer@avenueglobaladvisors.com.