

Effective date: March 2020

Welcome to [www.RedSwan.io](http://www.RedSwan.io) the website owned by RedSwan PC, Inc. We are committed to protecting your privacy. This Privacy Policy applies to our website, [www.redswan.io](http://www.redswan.io) (our "Website"). This Privacy Policy describes how we collect, use, disclose and otherwise process Personal Information about you when you visit our Website, submit Personal Information directly to us on the Website, or otherwise contact us or inquire about or use our products and services (collectively, together with the Website, our "Service"). This Privacy Policy also explains how we process Personal Information in the context of our customer, vendor and partner relationships and the rights and choices available to individuals with respect to their Personal Information. "Personal Information" means any information relating to an identified or identifiable individual.

## 1. Personal Information We Collect

We may collect Personal Information about you from various sources described below. Where applicable, we indicate whether and why you must provide us with your Personal Information, as well as the consequences of failing to do so. If you do not provide Personal Information when requested, you may not be able to benefit from our Service if that information is necessary to provide you with it or if we are legally required to collect it.

### Information you provide to us directly

You may provide Personal Information directly to us, including:

- **Contact information**, such as your name, address, telephone number, and email address
- **Profile information**, such as the username and password you establish with the Services
- **Demographic details**, such as date of birth, country of citizenship and/or country of residence
- **Information about your net worth and/or income**, such as your stated net worth; stated current, historical, and expected future income; source(s) of income; and supporting documentation that you choose to submit (e.g., tax forms, tax returns, pay stubs, financial account statements, and information about your financial assets and liabilities)
- **Government-issued identification numbers (to the extent permitted under applicable law)**, such as a national identification number (e.g., a Social Security Number, tax identification number, or passport number), state or local identification number (e.g., a Driver's License or other government-issued identification number), and a copy of your government-issued identification card
- **Feedback and correspondence**, such as information you provide when you request information from us, receive customer support, or otherwise correspond with us, including by interacting with our pages on social networking online sites or services
- **Financial account information**, such as your bank account details and cryptocurrency wallet address

- **Transaction information**, such as details about financial transactions or investments you make with issuers using the technology services provided by RedSwan PC via the Service, including agreements you may execute (including by using your electronic signature)
- **Marketing information**, such as your preferences for receiving marketing communications and details about how often you wish to receive information.

## Information that we receive about third parties

We may receive information about individuals who do not interact with us directly. For example, our users, vendors, and partners may provide us with Personal Information about persons other than themselves when using the Service. We require that before we are provided with Personal Information relating to a third party, that the party providing the information has that individual's permission or lawful authority to share it with us for processing as described in this Privacy Policy. The types of information we receive about third parties includes:

- **Information about our users' companies**, such as Personal Information of the beneficial owners and authorized signatories of issuers raising funds or investing through the Service
- **Information about our users' professional or financial advisors**, such as the name and contact information about our users' lawyer, accountant, broker, or registered investment advisor, for purposes of verifying a user's status as an accredited investor

## Information we collect from vendors

We may receive information about you from our vendors. We have vendors help us to verify the identity and accredited investor status of users of our Service, and perform KYC and AML checks. These vendors may provide us with information such as:

- Whether you or your company are on government lists of restricted persons (e.g., the OFAC list or other watch lists or sanctions lists)
- Whether there are adverse media reports regarding you or your company
- Whether you are an accredited investor per applicable law

## Information we collect from private and publicly accessible sources

We and our vendors may collect information about you that is publicly available, including from publicly accessible government lists of restricted persons, public databases, media and internet searches. We and our third-party verification providers may also collect information about you from non-public databases of third parties, to the extent permitted under applicable law.

## Sensitive Personal Information

We ask that you not send us, and you not disclose, any sensitive Personal Information such as: racial or ethnic origin, political opinions, religion, or otherwise to us. If you send or disclose any sensitive Personal Information to us when you use the Services, you must consent to our processing and use of such sensitive Personal Information in accordance with this Privacy Policy. If you do not consent to our processing and use of such sensitive Personal Information, you must not submit such sensitive Personal Information through our Website.

## Information collected via automated means

We, our service providers, and our business partners may collect Personal Information about you via automated means, such as via cookies, browser web storage, web beacons, embedded scripts, location-identifying technologies and similar technologies. The information that may be collected automatically includes your computer or mobile device operating system type and version number, manufacturer and model, device identifier, browser type, screen resolution, IP address, the website you visited before browsing to the Services, general location information such as city, state or geographic area; and information about your use of and actions on our Services. In addition, we collect this type of information when you read our HTML-enabled emails, our service providers may collect this type of information over time and across third-party websites. Please refer to our Cookies Policy for more details.

## 2. Use of Personal Information

RedSwan PC may use your Personal Information for the following purposes in connection with providing the Services:

- to operate, evaluate, maintain, improve, and provide to you the features and functionality of the Service.
- to manage identity verification of and perform KYC and AML checks on our users.
- to manage accreditation verification of our investors.
- to process purchases and investments you make with issuers through the Service.
- to communicate with you regarding your account with us, if you have one, including by sending you Service-related emails or messages.
- to diagnose or fix technology problems.

### To send you marketing communications

If you request information from us (such as signing up for our newsletter), register on the Website, or participate in our new listings and promotions, we may send you RedSwan PC-related marketing communications, which may be tailored to you, as permitted by law. You will have the ability to opt out of such communications at all times.

### To comply with law

We use your Personal Information as we believe necessary or appropriate to comply with applicable laws, lawful requests and legal process, such as to respond to subpoenas or requests from government authorities.

### For compliance, fraud prevention, and safety

We use your Personal Information as we believe necessary or appropriate to (a) enforce the terms and conditions that govern the Website; (b) protect our rights, privacy, safety or property, and/or that of you or others; and (c) protect, investigate and deter against fraudulent, harmful, unauthorized, unethical or illegal activity.

## 3. Sharing of Your Information

We do not share or otherwise disclose Personal Information we collect about you, except as described in this Privacy Policy or otherwise disclosed to you at the time of the collection. We may share your Personal Information in the instances described below:

### Internal Disclosures

We may share Personal Information with our headquarters and affiliates, other companies and brands owned or controlled by RedSwan PC and other companies owned by or under common ownership as RedSwan PC, which also includes our subsidiaries (i.e., any organization we own or control). Personal Information will only be available to those who need such access for purposes consistent with this Privacy Policy or where required by applicable law.

### Service Providers

We engage certain trusted third parties to perform functions and provide services to us (e.g., verification providers, website hosting providers and other parties who assist us in operating our Website, conducting our business, managing our marketing campaigns and mailings, performing tax and accounting activities, performing analytics, or serving our customers). We may share your Personal Information with these third parties, but only to the extent necessary to perform these functions and provide such services. We also require these third parties to maintain the privacy and security of the Personal Information they process on our behalf.

### Broker-Dealer

Certain investment opportunities that are available through the Services may be offered by a broker-dealer, which may be an affiliate of RedSwan PC or an unaffiliated third-party. Broker-dealers are securities professionals that are registered with the US Securities and Exchange Commission and are members of FINRA. We may disclose Personal Information to broker-dealers in connection with their offerings. Where an offering is made by a broker-dealer and you seek to participate in that offering, we are required to disclose Personal Information to that broker-dealer to comply with applicable US laws. The broker-dealers use of Personal Information is subject to its Privacy Policy. The offering documents will disclose the broker-dealer associated with an offering before you make an investment through the Services.

## Issuers

We may disclose Personal Information to the issuer of an investment in which you have signed a subscription agreement or otherwise invested. For example, when you make an investment with an issuer, we may disclose information such as name and contact details, Social Security Number or tax identification number, and results of investor verification and confirmation that an investor is eligible to participate in the offering. If you seek to contact the issuer through the Service (e.g., to ask a question), we will disclose your contact information to the issuer. An issuer typically needs this information for its own legal compliance and to maintain its ledger of investors. However, we do not control how an issuer uses the Personal Information that we provide to it.

## Other Disclosures

We may disclose Personal Information to our auditors, accountants, attorneys, CPAs and other professional advisors, insurance companies and brokers and financial institutions, as necessary in the course of the professional services that they render to us. If RedSwan PC is involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, sale of RedSwan PC assets or transition of service to another provider, Personal Information may be disclosed or transferred as part of such a transaction as permitted by applicable law or contract. We may also disclose Personal Information to third parties as required by law or subpoena or if we reasonably believe that such action is necessary to (a) comply with applicable law and the reasonable requests of law enforcement; (b) to protect the security or integrity of our Website or Services; and/or (c) to exercise or protect the rights, property, or personal safety of RedSwan PC, our visitors, or others, including by protecting, investigating and deterring against fraudulent, harmful, unauthorized, unethical or illegal activity, and by enforcing the terms and conditions that govern our Website or Services.

# 4. Rights and Choices

## Marketing Communications

You can opt out from receiving marketing email communications from us by clicking on the unsubscribe link provided in such communications. We make every effort to promptly process all unsubscribe

requests. You may continue to receive administrative messages from us, such as purchase confirmations, updates to our terms and conditions, and other policies.

## Information Collected via Automated Means

If you would prefer not to accept cookies, most browsers will allow you to: (i) change your browser settings to notify you when you receive a cookie, which lets you choose whether or not to accept it; (ii) disable existing cookies; or (iii) set your browser to automatically reject cookies. Please note that blocking or disabling cookies may negatively impact your experience using the Website, as some features and services on our Website may not work properly. Depending on your mobile device and operating system, you may not be able to delete or block all cookies. You may also set your email options to prevent the automatic downloading of images that may contain technologies that would allow us to know whether you have accessed our email and performed certain functions with it.

## Modifying or deleting your information

If you have any questions about reviewing, modifying, or deleting your information, or if you want to remove your name or comments from our website or publicly displayed content, you can contact us directly at [privacy@redswan.io](mailto:privacy@redswan.io). We may not be able to modify or delete your information in all circumstances.

## Cookies and browser web storage

We may set cookies on our Website and may allow service providers and other third parties to use cookies and similar technologies to track your browsing activity over time and across the Website and third-party websites. For more details, see our Cookies Policy.

## Targeted online advertising

Some of the business partners that collect information about users' activities on our Website may be members of organizations or programs that provide choices to individuals regarding the use of their browsing behavior or mobile application usage for purposes of targeted advertising.

If you choose to opt-out of targeted advertisements, you will still see advertisements online; however, they may not be relevant to you. Not all companies that serve online behavioral advertising are included in this list, and so you may still receive some cookies and advertisements from companies that are not listed.

## Choosing not to share your Personal Information

Where we are required by law to collect your Personal Information, or where we need your Personal Information in order to provide services or the Website to you, if you do not provide this information when requested (or you later ask to delete it), we may not be able to provide you with our services. We

will tell you what information you must provide to receive the Services by designating it as required on or through the Services or through other appropriate means.

## 6. Data Security

We care about the security of your information and employ physical, administrative, and technological safeguards designed to preserve the integrity and security of all information collected through our Website. These measures are designed to appropriately protect Personal Information against accidental or unlawful destruction, accidental loss, unauthorized alteration, unauthorized disclosure or access, misuse, and any other unlawful form of processing of the Personal Information in our possession. However, no security system is 100% secure, and we cannot guarantee the security of our systems or your Personal Information.

## 7. Children's Privacy

We do not knowingly collect or solicit any information from anyone under the age of 16 on our Website. In the event that we learn that we have inadvertently collected Personal Information from a child under age 16, we will delete that information as quickly as possible. If you believe that we might have any information from a child under 16, please contact us at [privacy@RedSwan.io](mailto:privacy@RedSwan.io)

## 8. Links to Other Websites and Services

The Website may contain links to and from third party websites of our business partners and social media sites and our users may post links to third party websites. If you follow a link to any of these websites, please note that these websites may have their own privacy policies and that we do not accept any responsibility or liability for their policies. We strongly recommend that you read their privacy policies and terms and conditions of use to understand how they collect, use, and share information. To the extent any features or linked websites you visit are not owned or operated by RedSwan PC, we are not responsible for the privacy policies or practices of those third parties.

## 9. How to Contact Us

If you have any questions about this Privacy Policy or our data practices, please contact us at [info@redswan.io](mailto:info@redswan.io) You may also write to us at:

RedSwan PC Inc.  
Attn: Legal – Privacy  
8121 Broadway, suite 301  
Houston, Texas, 77061

## 10. Changes to Our Privacy Policy

We may modify or update this Privacy Policy at any time to reflect the changes in our business and practices, and so you should review this page periodically. If we make material changes to this Policy, we will notify you by updating the date of this Privacy Policy and posting it on the Website. We may also provide notification of changes in another way that we believe is reasonably likely to reach you, such as via e-mail or another manner through the Website.

Any modifications to this Privacy Policy will be effective upon posting (or as otherwise indicated at the time of posting). In all cases, your continued use of the Service after the posting of any modified Privacy Policy indicates your acceptance of the terms of the modified Privacy Policy.  
protection legislation. See the Contact Us section above for our contact details.

## Legal bases for processing

We use your Personal Information only as permitted by law. We are required to inform you of the legal bases of our processing of your Personal Information. If you have questions about the legal basis of how we process your Personal Information, contact us at [info@redswan.io](mailto:info@redswan.io)

## Retention

We will only retain your Personal Information for as long as necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for Personal Information, we consider the amount, nature, and sensitivity of the Personal Information, the potential risk of harm from unauthorized use or disclosure of your Personal Information, the purposes for which we process your Personal Information and whether we can achieve those purposes through other means, the applicable legal requirements, and the statute of limitations.

When we no longer require the Personal Information, we have otherwise collected about you, we will dissociate such information attached to your content. In some circumstances we may redact your Personal Information (so that it can no longer be associated with you), in which case we may use this information indefinitely without further notice to you.

## Your rights under European Data Protection Laws

European data protection laws give European users certain rights regarding their Personal Information. If you are located within the European Union, you may ask us to take the following actions in relation to your Personal Information that we hold:

- **Withdraw consent.** Withdraw any consent you previously provided to us. We will apply your preferences going forward and this will not affect the lawfulness of the processing before your consent withdrawal.



- **Access.** Provide you with information about our processing of your Personal Information and give you access to your Personal Information.
- **Correct.** Update or correct inaccuracies in your Personal Information.
- **Delete.** Delete your Personal Information.
- **Transfer.** Transfer a machine-readable copy of your Personal Information to you or a third party of your choice.

You can submit these requests by email to [privacy@redswan.io](mailto:privacy@redswan.io) our postal address provided above. We may request specific information from you to help us confirm your identity and process your request. Applicable law may require or permit us to decline your request. If we decline your request, we will tell you why, subject to legal restrictions. If you would like to submit a complaint about our use of your Personal Information or response to your requests regarding your Personal Information, you may contact us as described above or submit a complaint to the data protection regulator in your jurisdiction.