

Privacy Policy

Sandpath Advisors ("Sandpath") values the privacy of those who use our website. Please read the Sandpath Advisors Online Privacy Policy ("Privacy Policy") below for details about particular Sandpath sites and services that you may use.

This Privacy Policy applies to data collected by Sandpath Advisors through its website and services. This Privacy Policy governs information you provide to us or we learn from your use of our website and tells you how we may collect, use and, in some instances, share this information.

Information We Collect

In order to access some Sandpath services, you will be asked to provide what is generally called "personal information" (such as your name, email address, social security number, tax identification number, company name, and title/position). You may also be requested to provide questions and secret answers, which we use to help verify your identity and assist in resetting your password.

We may collect "tracking information" about your visit, including the pages you view, the links you click and other actions taken in connection with Sandpath site and services. We may also collect certain standard information that your browser sends to every website you visit, such as your IP address, browser type and language, access times and referring website addresses.

When you receive newsletters or promotional e-mail from Sandpath, we may use web beacons, customized links or similar technologies to determine whether the e-mail has been opened and which links you click in order to provide you more focused e-mail communications or other information.

In order to offer you a more consistent and personalized experience in your interactions with Sandpath, information collected through one Sandpath service may be combined with information obtained through other Sandpath services. Do not submit any information or other materials that you consider confidential or proprietary.

The Way We Use Information

Broadly speaking, we use personal information for purposes of administering our business activities, delivering newsletters to subscribers, delivering information to our investors, providing customer service, and making available other products and services to the users of our website. Additionally, we may use all of the information that we collect from our users to understand their usage trends and preferences, to improve the way our website works and looks, to improve our marketing and promotional efforts, and to create new features and functionality.

Personal information collected on Sandpath sites and services may be stored and processed in the United States or any other country in which Sandpath or its affiliates, subsidiaries or agents maintain facilities, and by using a Sandpath site or service, you consent to any such

transfer of information outside of your country. Sandpath abides by the safe harbor framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of data from the European Union.

Sharing of Your Information

Except as otherwise noted in this Privacy Policy, we do not share personal information about our users with third parties unless doing so is appropriate to carry out a user's request or it reasonably believes that doing so is legally required or is in our interest to protect our property or other legal rights or the rights or property of others. We occasionally hire other companies to provide limited services on our behalf, such as processing tracking information; providing customer support; hosting our websites; performing statistical analysis; assist us to understand usage patterns for certain content, services, and/or the functionality of our website; provide website maintenance and security; to offer certain features on our website; to assist us in improving the way our website works and looks; and to create new features. Those companies will be permitted to obtain only the personal information they need to deliver the service. They are required to maintain the confidentiality of the information and are prohibited from using it for any other purpose.

We do not share user personal information with other, third-party organizations for their marketing or promotional use without your consent or except as part of a specific program or feature for which you will have the ability to opt-in. Sandpath will not sell or rent your personal information to third parties and will only disclose your personal information in accordance with this Privacy Policy.

Accessing Your Personal Information

You may have the ability to view or edit your personal information online. In order to help prevent your personal information from being viewed by others, you will be required to sign in with your credentials (user ID/name and password). The appropriate method(s) for accessing your personal information will depend on which sites or services you have used.

Security of Your Personal Information

Sandpath is committed to protecting the security of your personal information. No data transmissions over the Internet can be guaranteed to be 100% secure. Consequently, we cannot ensure or warrant the security of any information you transmit to us and you do so at your own risk. Once we receive your transmission, we make reasonable efforts to ensure security on our systems. We use secure server software (SSL) and firewalls to protect your information from unauthorized access, disclosure, alteration, or destruction. However, please note that this is not a guarantee that such information may not be accessed, disclosed, altered or destroyed by breach of such firewalls and secure server software.

A password is used to help protect personal information. It is your responsibility to keep your password confidential. Do not share this information with anyone. If you are sharing a computer with anyone you should always choose to log out before leaving a site or service to protect access to your information from subsequent users.

If we learn of a security systems breach we may attempt to notify you electronically so that

you can take appropriate protective steps. By using our website or providing personal information to us you agree that we can communicate with you electronically regarding security, privacy and administrative issues relating to your use of this site. We may post a notice on our website if a security breach occurs. If this happens, Sandpath Capital may send an email to you at the email address you have provided to us in these circumstances. Depending on where you live, you may have a legal right to receive notice of a security breach in writing. To receive free written notice of a security breach (or to withdraw your consent from receiving electronic notice) you should notify us at info@sandpath.com.

Children

Consistent with the federal Children's Online Privacy Protection Act of 1998 (COPPA), we will never knowingly request personally identifiable information from anyone under the age of 13 without requiring parental consent. Any person who provides their personal information to Sandpath through our website represents that they are 13 years of age or older.

Use of Cookies

Sandpath website uses "cookies" to gather general information about the browsing activities of visitors to our website. This allows us to constantly improve the website design by arranging the content in the most user-friendly manner and to continually meet the users' needs. A cookie is a small text file that is placed on your hard disk by a web page server. Cookies contain information that can later be read by a web server in the domain that issued the cookie to you. Cookies cannot be used to run programs or deliver viruses to your computer. You have the ability to accept or decline cookies. Most Web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you choose to decline cookies, you may not be able to sign in or use other interactive features of Sandpath sites and services that depend on cookies.

Use of Web Beacons

Sandpath Web pages may contain electronic images known as Web beacons - sometimes called single-pixel gifs - that may be used to assist in delivering cookies on our sites and allow us to count users who have visited those pages and to deliver co-branded services. We may include Web beacons in promotional e-mail messages or our newsletters in order to determine whether messages have been opened and acted upon. Sandpath may also employ Web beacons from third parties in order to help us compile aggregated statistics and determine the effectiveness of our promotional campaigns. We prohibit Web beacons on our sites from being used by third parties to collect or access your personal information.

Other Web Sites Linked to Our Website

Some Sandpath services may be co-branded and offered in conjunction with another company. If you register for or use such services, both Sandpath and the other company may receive personal information collected in conjunction with the co-branded services.

We are not responsible for the practices employed by web sites linked to, or from, our website nor the information or content contained therein. Please remember that when you use a link to go from our website to other web sites, our Privacy Policy is no longer in effect. Your browsing and interaction on any other web sites, including web sites which have a link

on our website, is subject to that website's own rules and policies. Please read over those rules and policies before proceeding.

Changes and Updates

We will occasionally update this Privacy Policy. We encourage you to periodically review this Privacy Policy to stay informed about how we are protecting the personal information we collect. Your continued use of this website constitutes your agreement to this Privacy Policy and any updates.

If Sandpath should ever sell its assets, merge with another entity or file for bankruptcy, information collected from this website is a Sandpath asset and may be transferred.

International Visitors and Users

This Website is hosted in the United States. If you are visiting from the European Union or other regions with laws governing data collection and use that may differ from U.S. law please note that you are transferring your personal data to the United States which does not have the same data protection laws as the EU. By providing your personal information you consent to the use of your personal information for the uses identified above in accordance with this Privacy Policy and the transfer of your personal information to the United States as indicated above.

Disclaimer

Because of the large number of business plans and related materials that we review, and the similarity of many such plans and materials, we cannot accept responsibility for protecting against misuse or disclosure of any confidential or proprietary information or other materials in the absence of our express written agreement to do so.

Contacting Us

Sandpath welcomes your feedback regarding this Privacy Policy. If you have questions, comments, or concerns about this Privacy Policy, please contact us by email at info@sandpath.com.