

PRIVACY POLICY

Last updated Wednesday, January 1 2020 (“Effective Date”)

1. GENERAL

The website (“Website”) for AdvisorBid Inc. (“AdvisorBid”, “Marketplace”, “we”, or “us”) was created to provide transparency for all opportunities throughout the financial services industry with a core focus on recruiting, transitions, buying and selling of advisor books of business (together with the Website, the “Services”). We value the privacy of our Services visitors (“you”, “your”, or “user”), and in order to protect your personal information, we have implemented the following Privacy Policy with provisions that apply to the collection, retention, and use of data by AdvisorBid, its subsidiaries, and its affiliates. If you have any questions or concerns regarding this statement, you should contact us at contact@advisorbid.com.

Our Privacy Policy discloses the type and nature of information we collect and how we use it, as well as the choices you can make about the way your information is collected and used. We also explain how any requests for personal or personally identifiable information will be used. Finally, we present our security policy, which outlines how your personal information is protected.

2. INFORMATION COLLECTION

By visiting <https://AdvisorBid.com>, you consent to our collection and use of information as explained in this Privacy Policy, and you agree to be bound by our Terms of Use. Please note that if you choose to recruit advisors, or register a company profile on our website, you may be required to agree to a separate agreement, including, but not limited to, new or additional privacy notices or terms of use. If you have questions or concerns regarding this Privacy Policy, please contact us at contact@advisorbid.com.

Important Information About Procedures for Opening a New Account

When you open an account, we will ask for your legal first name, last name, zip code, legal FINRA registered broker-dealer and/or SEC registered RIA affiliation that will allow us to identify you. If you sign up using your LinkedIn Authentication, then the first step of your identify will be verified. If you do not sign up using your LinkedIn Authentication, then you will need to verify your e-mail address with a unique access link that will be sent to the e-mail that User signed up with from the AdvisorBid Website and/or e-mail server of AdvisorBid.

Required Information to Create User Account

User registration will require you to provide personal data and business data. Personal data and business data typically includes your name, email address, whether a User is a registered financial advisor, business address and Financial Industry Regulatory Authority (“FINRA”) registered broker-dealer and/or U.S. Securities and Exchange Commission (“SEC”) affiliation(s).

AdvisorBid uses this data to:

- (i) enable you to log in to the Website;
- (ii) establish your ability to maximize opportunities on the Site;
- (iii) determine your credibility to partake in opportunities;
- (iv) verify that you are at least 18 years of age;
- (v) guard against potential fraud;
- (vi) contact you if there is a problem with your account; and
- (vii) maintain regular communications with you as may be necessary to inform you of upcoming opportunities and other company updates.

Traffic Data Collected

We automatically track and collect the following categories of information when you visit our Site: (1) IP addresses; (2) domain servers; (3) types of computers accessing the Site; and (4) types of web browsers used to access the Site (collectively "Traffic Data"). Traffic Data is anonymous information that does not personally identify you but is helpful for marketing purposes or for improving your experience on the Site. We also use "cookies" to customize content specific to your interests, to ensure that you do not see the same advertisement repeatedly, and to store your password so you do not have to reenter it each time you visit the Site.

Personal Information Collected

In order for you to access certain information and services that we offer via the Site, we require you to provide us with certain information that personally identifies you ("Personal Information"). Personal Information includes, but is not limited to, the following categories: (1) Contact Data (such as your name, mailing address, and email address); (2) Financial Data (such as your account or credit card number); (3) Demographic Data (such as your zip code, age, and income); and (4) Business Data (such as company and business information). If you communicate with us by email, post messages to any of our chat groups or forums, or otherwise complete online forms, surveys, or contest entries, any information provided in such communication may be collected as Personal Information.

Non-Personally Identifiable Information

AdvisorBid collects non-personally identifiable information from you regarding your usage of our website ("Non-Personally Identifiable Information"). Non-Personally Identifiable Information may include, without limitation, website pages viewed, articles, presentation and videos viewed, time spent using certain features of the website, demographic data such as server locations, cookies existing on your computer, search criteria used and results, date, time,

connection speed, and other information which does not specifically identify you. Regardless of whether you register for an account or submit an application, AdvisorBid collects Non-Personally Identifiable Information using various technologies, including, but not limited to, cookies and server logs.

"Cookies" are small text files placed on your web browser when you visit our Website that store information on your computer, such as your Website preferences. We use cookies when you sign in to keep track of your personal session, including some account identifiers to ensure that you are the only person making changes to your account. We also use cookies to track your activity on the Website as a unique person. For security purposes, all of this information is stored in encrypted form. No personal information about you is stored in this manner. You can set your web browser to inform you when cookies are set, or to prevent cookies from being set altogether. Please note, however, that if you decline to use cookies, you may experience reduced functionality and slower Website response times. In some instances, declining to use our authentication-related cookies may prevent you from using the Website entirely. "Server logs" can be either a single log file or several log files automatically created and maintained by a server of activity performed by the server, which can include information about any transaction you conduct with the server.

AdvisorBid (or our service providers, such as Google Analytics) may also collect web surfing data related to your use of the Website. Such information may include: your Internet Protocol (IP) address, browser type, and internet service provider (ISP); your operating system; which of our web pages you access and how frequently you access them; referral or exit pages; click stream data; and the dates and times that you visit the Website. This data may be collected using cookies, web beacons, page tags or similar tools. As with cookies, the web surfing information is anonymous, "click stream" transactional data that is not associated with any users as individuals.

Web surfing data and similar information may be aggregated for administrative purposes. AdvisorBid may, for example, use this aggregated information in the administration of the Website to improve its usability and to evaluate the success of particular marketing and advertising campaigns, search engine optimization strategies, and other marketing activities. We also use it to help optimize the Website based on the needs of our users.

Advisors in Transition or Selling Book of Business

Producing financial advisors that are looking to transition to a new FINRA registered broker-dealer ("BD") or SEC Registered Investment Adviser ("RIA"), or looking to sell their book of business to another advisor (or adviser) will have their profiles anonymized so no Personally Identifiable Information will NOT been seen by any user or company in which User has not connected to another User or accepted a connection request from such User, and will not be viewable by any company in which user has not clicked "Express Interest" on such Company profile. If an advisor is anonymized, and is already connected to another user or clicked "Express Interest" button on Company profile, that user [or admin User(s) of such Company profile that you clicked "Express Interest" on] will be able to view advisor in transition (or selling book of

business) Personal Identifiable Information to connect with, e-mail, and/or call you outside of AdvisorBid website.

AdvisorBid also collects personal information, business information, and book of business breakdown of information from you and your business when you visit the Website. The majority of information is collected during the registration and application processes, as well as when you sign up for an account, transition to a new broker-dealer or RIA, provide payment instructions or send us an email through the AdvisorBid website which may enable us to identify you personally ("Personally Identifiable Information" and collectively with the Non-Personally Identifiable Information, the "Data"). While some items are optional, most are required to verify **identity**. You may choose to provide additional information during subsequent visits to the Website, but keep in mind that some of this information will be required if you wish to partake in the Services. We may request additional information to help verify your identity or for other purposes. AdvisorBid reserves the right to obtain information about you and or your company from third parties, such as however not limited to FINRA, the SEC, identity verification services, or other third parties at AdvisorBid's discretion for the purposes of, however not limited to, ensuring the accuracy of information. AdvisorBid may use third party data to override your user and or company profile information. If you believe that your information on your User and/or Company profile is not accurate, then please contact us at contact@advisorbid and we'll help you and your company profile update the information on your profile so that the information is as accurate as possible.

LinkedIn Authentication

AdvisorBid has a feature to allow users to use their LinkedIn User name and Password as an authentication token to sign up to the Marketplace more quickly. AdvisorBid only stores the encrypted token produced by LinkedIn and will never be in possession of Users actual password for LinkedIn.

Google API

AdvisorBid uses location and zip code provided by Users to calculate User's latitude and longitude using Google API to help Users more effectively identify opportunities. AdvisorBid collects data from many resources to determine general location of each User, however AdvisorBid does not guarantee or ensure the accuracy of such locations.

Stripe API

AdvisorBid uses Stripe API for payment processing for marketing purposes, such as AdvisorBid's Weekly Snapshot or advertising throughout AdvisorBid Website, as those features or advertising opportunities become available.

Miscellaneous

AdvisorBid may also collect and store information, which could include Non-Personally Identifiable Information or Personally Identifiable Information, locally on your computer or device using mechanisms such as browser web storage or application data caches.

We may also have access to your Personally Identifiable Information when you log into our website through certain third party social networking services, including Facebook, LinkedIn, Twitter and Internet Chat ("Third Party Services"). We encourage you to carefully review the privacy policies of any Third Party Services from which you access our website.

This Privacy Policy does not cover the collection of information by cookies or other methods by third parties, such as our business partners. We do not control how such third parties collect information or by what means as such third parties may use their own cookies to collect information about you.

3. HOW AND WHEN YOUR INFORMATION IS SHARED WITH OTHER PARTIES

AdvisorBid does not sell or rent personal information for marketing purposes about its users or company profiles that you've uploaded or shared, unless otherwise stated in this Privacy Policy.

Usage & Sharing of Data

AdvisorBid will use information you provide consistent with this Privacy Policy. AdvisorBid will use information you provide to us, including Non-Personally Identifiable Information or Personally Identifiable Information, to better serve you and enhance your experience with the AdvisorBid website, among other things. This may include having to modify or copy such information, such as images or textual or narrative content you provide, in order to provide you with a seamless and enjoyable experience.

AdvisorBid will use Non-Personally Identifiable Information and Personally Identifiable Information that you've uploaded or shared:

- 1 to market our products and services to you,
- 2 to provide services and products requested by you,
- 3 to enable our vendors and contractors to provide and assist us in the marketing, operation, troubleshooting and analysis of our website and other services,
- 4 to meet any regulatory requirements as requested by any state or federal regulatory authority,
- 5 to engage in any other lawful activities we believe are consistent with the foregoing, and
- 6 to protect against legal liability.

We may provide any of these services through third parties, which may necessitate sharing Personally Identifiable Information and Non-Personally Identifiable Information with them.

Except as otherwise provided in this Privacy Policy, we will keep your Personal Information private and will not share it with third parties, unless such disclosure is necessary to: (a) comply with a court order or other legal process; (b) protect our rights or property; or (c) enforce our Terms of Service. Your Non-Personally Identifiable Information and Personally Identifiable Information is stored on secure servers that are not accessible by third parties. We provide you

with the capability to transmit your Personal Information via secured and encrypted channels if you use a similarly equipped web browser.

If you provide Data for a certain reason, we may use the Data in connection with the reason for which it was provided. For instance, if you contact us by email, we will use the Data you provide to answer your question or resolve your problem. AdvisorBid may also use your Data and other personally non-identifiable information collected through our website to help us improve the content and functionality of our website, to better understand our users and to improve our services. As user of our services we will send you administrative communications that are reasonably necessary to our services, such as billing or service notifications.

Notifications and Communications from Our Website

AdvisorBid will send you email notifications from time to time. Some notifications are required elements of your transactions on our platform, such as confirmations of particular actions you have taken. These mandatory notices are sent typically to notify you of a change in status. For example, you will receive a notice when you are confirmed as an investor.

We also send out notices that are required for legal or security purposes. For example, certain notifications are sent for your own protection to ensure that another person cannot make a change to your account without your knowledge. In other cases, these notifications involve changes to various legal agreements or Website policies. Generally, you may not opt out of such service-related emails.

We may also send you responses to emails you send us, if appropriate. From time to time, we will also send user surveys, requests for user feedback regarding user experience and Website operations, or marketing offers from us or from us on behalf of our marketing partners. Completing these surveys, answering requests for feedback, or accepting any offer is strictly voluntary. If you do not wish to receive these surveys, user feedback emails, and/or marketing offers, please opt out in any offer email you receive from us.

Testimonials

We may display personal testimonials of satisfied customers on our site in addition to other endorsements. Unless otherwise stated by state or federal laws, AdvisorBid cannot delete or modify testimonials uploaded by other Users about you and/or Company profile. We may post or share testimonial(s) along with your name and other information with other social sites such as, however not limited to Facebook, Instagram, Twitter, and LinkedIn.

Messaging

The AdvisorBid website permits users to communicate with companies and other users posting information on the website. We may read, collect and analyze information transmitted between users for regulatory compliance and marketing purposes. However, as explained in our Terms of Use, we rely on the affirmations of users as defined in the Terms of Use. We do not guarantee

that information provided by website visitors or investors is accurate or complete. AdvisorBid assumes no liability or responsibility for any errors or omissions in the content of its website.

Social Media Features

You can log into or use functionality within our Website using sign-in services such as Facebook, Google, Twitter, or LinkedIn. These services authenticate your identity and provide you the option to share or authenticate certain information with us and through their respective social networks, such as however not limited to, your name and email address to pre-populate the user sign-up form.

Our Website may contain social media features, including however not limited to utilizing Facebook, Twitter, and Google Now's +1 Button. These features may cause the associated third-party sign-in services to collect your IP address, pages you are visiting on our Website, and may create a cookie to allow the feature to function properly. Social media features are either hosted by a third party or hosted directly on our Website. Your interactions with those features are governed by the privacy policy of the third-party company providing it.

Social Media Features

As part of user benefits and services, AdvisorBid may electronically e-mail news of professional interest to you, including information on AdvisorBid users, companies, events, products and/or services, via the Internet. If you do not wish to receive any information from us over the Internet, there are several ways to opt-out. You may opt-out and/or edit your communication preferences in your Account Settings, or by contacting AdvisorBid at contact@advisorbid.com.

Completion of Data

An AdvisorBid representative may help complete any user or company profile on behalf of user or company, or may have communications with user or company outside of the AdvisorBid website to attempt to complete user or company data. If you believe your information on your User or Company profile to be inaccurate, please attempt to update your User or Company profile once signed in by clicking your name in the top right corner, or contact us at contact@advisorbid.com for additional help.

Posting Information

If you use post or share information on the Website, you should be aware that any personally identifiable information you submit there can be read, collected, or used by other users of this forum and could be used to send you unsolicited messages. We are not responsible for the personally identifiable information you choose to submit in posts. To request removal of your personal information from the Marketplace, contact us at contact@advisorbid.com. In some cases, we may not be able to remove your personal information, in which case we will let you know if we are unable to do so and why.

This Privacy Policy does not apply to any Data collected by AdvisorBid other than Data collected through the website. This Privacy Policy shall not apply to any unsolicited information

you provide to AdvisorBid through this website or through any other means. This includes, but is not limited to, information posted to any public areas of the website, such as bulletin boards (collectively, "Public Areas"), any ideas for new products or modifications to existing products, and other unsolicited submissions (collectively, "Unsolicited Information"). All Unsolicited Information shall be deemed to be non-confidential and AdvisorBid shall be free to reproduce, use, disclose, distribute and exploit such Unsolicited Information without limitation or attribution.

Additional Sharing of Data

AdvisorBid may employ or contract with other third parties, companies, or individuals to perform certain functions or services on its behalf. Examples of these services from such third parties, companies, or individuals, may include ID verification, accreditation/financial/credit verification, electronic document signing, payment storing and processing, sending postal mail and e-mail, escrow services, disbursement of funds, analyzing data, providing marketing assistance, and providing customer service. As such, these third parties, companies, or individuals may have access to your information, including Non-Personally Identifiable Information or Personally Identifiable Information, as needed to perform their functions or services, and may not use it for other purposes. Our partners are legally required to keep your information private and secure.

We may share your information with law enforcement or other government agencies as required by law or for the purposes of limiting fraud. We reserve the right to disclose your Personally Identifiable Information when we believe that disclosure is necessary to protect our rights or to comply with a judicial proceeding, court order or legal process. We further reserve the right to disclose any of your personal information that we believe, in good faith, appropriate or necessary to take precautions against liability, to investigate and defend against any third party claims or allegations, to assist government enforcement agencies, to protect the security or integrity of the Website or our services, or to protect the rights, property or personal safety of AdvisorBid, its users, issuers, or others.

AdvisorBid may disclose your Data if required to do so by law or in the good faith belief that such action is necessary to:

- (i) comply with a legal obligation,
- (ii) protect and defend the rights or property of AdvisorBid,
- (iii) act in urgent circumstances to protect the personal safety of users of the website or the public against fraud or other harm, or
- (iv) protect against legal liability.

We might sell or buy businesses or assets. In the event of a corporate sale, merger, reorganization, dissolution or similar event, Data may be part of the transferred assets and you will be notified via email and/or a prominent notice on our Website of any change in ownership or uses of your personal information, as well as any choices you may have regarding your personal information. Any successor in interest to our business would acquire the information we maintain, including Personally Identifiable Information, and may alter the terms of this Privacy Notice. We may also share your Data with our affiliates for purposes consistent with this Privacy Policy.

4. WHERE YOU CAN VIEW AND CORRECT INFORMATION

We urge you to review your information regularly to ensure that it is correct and complete. If you believe that any of your information is incorrect, or if you have any questions regarding this Privacy Policy, or if you would like us to make your information not searchable by the public or by Users from our database, please contact us at contact@AdvisorBid.com. We are not responsible for removing your Personally Identifiable Information from the lists of any third party who has previously been provided your information in accordance with this notice.

5. CHILDREN'S ONLINE PRIVACY PROTECTION ACT COMPLIANCE

The AdvisorBid website is not intended for use by children, especially those under age thirteen (13) years of age. No one under age thirteen (13) years of age is allowed to use the site, provide any personal information or receive our email distributions. We do not knowingly solicit or collect Personally Identifiable Information from children or teenagers under the age of thirteen (13). If you believe that a minor has disclosed Personally Identifiable Information to AdvisorBid, please report this to us immediately by emailing us at: contact@advisorbid.com.

6. LINKS TO OTHER WEBSITES

If you follow any links that direct you away from the Website, this privacy policy will not apply to your activity on the other Websites you visit. We do not control the privacy policies or the privacy practices of any third parties.

7. APPLICABLE LAWS AND JURISDICTION

The Website may be accessed by users located outside the United States. If you choose to use the Service from the European Union or other regions of the world with laws governing data collection and use that may differ from U.S. law, then please note that you are transferring your personal information outside of those regions to the United States, and that by providing your personal information on or through the Website then you consent to that transfer.

This Privacy Policy shall be governed by, construed and entered in accordance with the laws of the State of Florida applicable to contracts deemed to be made within such state, without regard to choice of law or conflict of law provisions thereof. All disputes with respect to this Privacy Notice shall be brought and heard either in the Florida State Courts located in the county of Miami, Florida or the federal district court for **the state of** Florida. You consent to the *in*

personam jurisdiction and venue of such courts. YOU HEREBY WAIVE YOUR RIGHT TO A TRIAL BY JURY WITH RESPECT TO ANY CLAIM, ACTION OR PROCEEDING, DIRECTLY OR INDIRECTLY, ARISING OUT OF, OR RELATING TO, THIS AGREEMENT TO THE FULLEST EXTENT PERMITTED BY LAW.

8. SITE & SERVICE UPDATES

We also send AdvisorBid users site and service announcement updates. Users are not able to unsubscribe from service announcements, which contain important information about the service. We communicate with the user to provide requested services in connection with issues relating to their account via e-mail or phone.

9. CHOICE/OPT-OUT

AdvisorBid users are given the opportunity to 'opt-out' from having their information used for purposes not directly related to our websites, at the point where we ask for the information. For example, our Site has 'opt-out' mechanisms so users who sign up to the Site, but don't want to receive marketing material from AdvisorBid, can keep their email address off of the marketing lists. Users who no longer wish to receive our electronic communications may opt out of receiving these communications by clicking the "Opt-out" or "Unsubscribe" options at the bottom of the email, logging in to your AdvisorBid profile at <https://advisorbid.com>, or e-mail the AdvisorBid Team at contact@advisorbid.com.

10. SPECIAL OFFERS

Established members will occasionally receive information on products, services, special deals and newsletters exclusively from AdvisorBid. As mentioned earlier, we do not share e-mail addresses of members with third-parties outside of what is outlined in this privacy policy. Out of respect for the privacy of our users, we present the option to not receive these types of communications. Please see our Choice/Opt-out policy above.

11. LOST OR STOLEN INFORMATION.

You must promptly notify us if your credit card, user name, or password is lost, stolen, or used without permission. In such an event, we will remove that credit card number, user name, or password from your account and update our records accordingly.

12. NOTIFICATION OF CHANGES

We reserve the right, in our sole discretion, to change, modify, add, or remove portions of this notice at any time. Any changes or updates will be effective immediately upon posting to the Website. You should review this notice regularly for changes, and can determine if changes have been made by checking the Effective Date at the top of this document. Your continued use of our website following the posting of any changes to this notice means you accept such changes.

YOUR CONSENT

By using AdvisorBid, you consent to our web site Privacy Policy.

This policy was last modified on Wednesday, January 1 2020.