

Privacy Policy

Spiegel & Grau, LLC (“S&G,” “we” or “us”) respects your privacy. We created this privacy policy (“Privacy Policy”) for our website accessible at www.spiegelandgrau.com (the “Website”) to demonstrate our firm commitment to your privacy and to help you understand how your information is collected and used. By using or accessing the Website, you agree to be bound by our Privacy Policy. If you do not agree to this Privacy Policy, you may not access or otherwise use the Website.

Personally Identifiable Information That We Collect

S&G only collects personally identifiable information about you that you voluntarily submit to us. We may collect this information in a variety of ways, including without limitation when you subscribe to our newsletter. You may visit the Website anonymously, and you may always refuse to supply personally identifiable information, although it may prevent you from using certain features on the Website. The personally identifiable information which you voluntarily provide to us and we collect could include, without limitation:

- Your name and e-mail address.
- Any content (e.g., comments, photographs, information and other materials) that you post to the Website or submit to us on the Website.
- Communications between you and us (e.g., emails).

Non-Personally Identifiable Information That We Collect

When you visit the Website, we may automatically collect certain non-identifying information about you, such as the computer operating system or mobile device that you use to access the Website, your Internet Protocol address, your browser type and settings, the date and time that you access the Website, the domain name of the website from which you arrived to the Website, links that you click on within the Website and other technical information that assists us in improving the Website.

Cookies and Similar Technologies

We may use “cookies,” “device identifiers” or similar types of technology (e.g., pixels tags, web beacons, clear GIFs, and local storage) to collect information about your use of the Website, such as pages you have visited, content you have viewed and search queries you have run. We may use this information to help us enhance the efficiency and usefulness of the Website and for other purposes to make your visit more convenient or to enable us to enhance the Website. For your information, “cookies” are files that are stored on your computer’s hard drive by a website, and “device identifiers” are files that are stored on your mobile device that identify your device. In addition, we may use third parties to provide products and services that support the Website, such as by allowing you to share content or tracking aggregate usage statistics (e.g., Google Analytics). These third parties may employ cookies, device identifiers, or similar technologies. We do not control these third-party technologies and their use is governed by the privacy policies of the third parties using such technologies. Your browser may allow you to control cookies or other types of local data storage, and your mobile device may provide you with information and choices on what data is shared with us.

How We Use Your Information

In addition to other specific uses that we describe in this Privacy Policy, we may use any information that we collect (including personally and non-personally identifiable information) to:

- Provide our products and services and information to you.
- Develop and test new products and services.
- Respond to your inquiries and comments and provide customer service.
- Send you updates (e.g., relating to special offers, features, and promotions), newsletters, marketing materials and other information from time to time, for which you will have the opportunity to either opt-in or opt-out, and to provide advertising to you on third party sites.
- Provide, improve, test and monitor the Website.
- Diagnose or fix technology problems.
- Manage our business.

Disclosure of Your Information

We may share your personally identifiable information when we have your consent. For example, when you submit or post any content to the Website, you grant us permission to share that information. We will not disclose your personally identifiable information to third parties without your consent, except as set forth below or provided elsewhere in this Privacy Policy:

- We may disclose your personally identifiable information to our vendors, subcontractors, and partners, and other third parties who provide services to us. However, they are only permitted to access your information in connection with performing such services and are not authorized by us to use the information for their own benefit.
- We may disclose your personally identifiable information to protect the safety, rights, or property of the public, any person, or S&G; to investigate, prevent, or otherwise address suspected fraud, harassment or other violations of any law, rule or regulation or the Terms of Use for the Website; to detect, prevent or otherwise address security or technical issues; or as we believe is required by law, regulation, or legal process.
- We do not sell or rent your personally identifiable information to third parties; provided, however, we may engage in a merger, acquisition, disposition, change of control, bankruptcy, dissolution, reorganization, or similar transaction or proceeding that involves the transfer of your information.

We may share non-personally identifiable information or generic aggregated demographic information with our partners or other third parties for any purpose.

Security

The security of your information is very important to us. We attempt to provide for the secure storage of your information by using commercially reasonable safeguards. Unfortunately, due to the inherent

nature of the Internet and online communications, we cannot ensure the security of any information you transmit to us or guarantee that information on the Website or our servers will be free from unauthorized access by third parties such as hackers. Your use of the Website demonstrates your assumption of this risk.

Other Websites, Application and Services

As a convenience to you, we may provide links to third-party websites, applications and services from within the Website. We are not responsible for the privacy practices or content of these third-party websites and services, and by providing a link we are not endorsing or promoting such third-party websites, applications and services. This Privacy Policy and our Terms of Use do not apply to any third party website, application or service. Your browsing and interaction on any third-party website, application or service, including those that have a link on our Website, are subject to that third party's own rules and policies. When you link away from our Website, you do so at your own risk.

Social Media

The Website may contain links to our presence on various social media platforms. As we do not operate or control such platforms, this Privacy Policy and our Terms of Use do not apply to your use of such platforms. In addition, you should be aware that personally identifiable information which you voluntarily include and transmit online in a publicly accessible blog, social network or other social media platform may be viewed and used by others. We are unable to control such uses of your personally identifiable information, and by using such services you assume the risk that the personally identifiable information provided by you may be viewed and used by third parties.

User Content and Communication With Us

Any material or communications you post or submit on the Website or transmit to us by email, including, without limitation, any information, photographs, data, questions, comments, or suggestions, will be treated as non-confidential and non-proprietary and may be used by us for any purpose, including, without limitation, reproduction, disclosure, transmission, publication, broadcast and posting.

Protection for Children

We do not seek to collect personally identifiable information from children under the age of 13. When we become aware that personal information from a child under 13 has been collected without such child's parent or guardian's consent, we will use all reasonable efforts to delete such information from our database. If you believe that we might have collected any information from or about a child under the age of 13, please contact us at hello@spiegelandgrau.com.

Changes to Privacy Policy

Please review this Privacy Policy from time to time. We reserve the right, at our discretion, to change, modify, add, or remove portions from this Privacy Policy at any time. Your continued use of the Website following the posting of any changes to this Privacy Policy means you accept such changes.

California Residents

As of January 1, 2020, California law permits residents of California to request certain details about how their personal information is shared with third-parties or affiliated companies for direct marketing purposes.

California residents may also take advantage of the following rights:

You may request, up to two times each year, that we disclose to you the categories and specific pieces of personal information that we have collected about you, the categories of sources from which your personal information is collected, the business or commercial purpose for collecting your personal information, the categories of personal information that we disclosed for a business purpose, any categories of personal information about you that we sold, the categories of third-parties with whom we have shared your personal information, and the business or commercial purpose for selling your personal information, if applicable.

You may request that we delete any personal information that we have collected from or about you. There may be some reasons we will not be able to fully address your deletion request, such to protect against fraudulent and illegal activity, to exercise our rights, or to comply with a legal obligation. You may also opt-out of any future sale of any personal information that we have collected from or about you. Please see the section entitled “*Opt-Out Process*” section below to access, update, and remove your information.

To take advantage of your disclosure, deletion and opt-out of future sale rights, please contact us via the options listed in the “*Opt-Out Process*” section below. We may need to verify your identity to enable us to process your request. We value your privacy and will not discriminate in response to your exercise of privacy rights. We will respond to your request within 45 days of receipt of your request, after proper verification, unless we need additional time, in which case we will let you know.

Below is a chart showing the types of potential identifiers that we may have disclosed or sold in the previous 12 months.

Categories of third parties to whom personal information may be disclosed	Categories of personal information provided	Was the personal information sold?
Advertising companies (like ad servers, advertising and marketing agencies, technology vendors, providers of sponsored content, and others)	Personal identifiers	No
Service Providers (like internet services, website hosting, data analytics, information technology and related infrastructure provision)	Personal identifiers	No

Opt-Out Process

To opt-out of any future promotional messages from us, you should send an unsubscribe request to us at hello@spiegelandgrau.com. We will process your request within a reasonable time after receipt.

Terms of Use

This Privacy Policy, and the use of the Website, is subject to our Terms of Use [<https://www.spiegelandgrau.com>].

United States of America

The Website is published and maintained in the United States. We attempt to protect the personal information of all users of the Website and we attempt to comply with local data protection and consumer rights laws to the extent they may apply to S&G's services, but the Website is located and targeted to United States citizens and our policies are directed at compliance with those laws. If you are uncertain whether this Privacy Policy conflicts with the applicable local privacy laws where you are located, you should not submit your personal information to S&G.

By accessing the Website from a jurisdiction outside of the United States, you freely and specifically give us your consent to export your personally identifiable information from your local jurisdiction to our servers in the United States and to store and use such information in the United States as set forth in this Privacy Policy.

Contact

For questions or concerns relating to Privacy Policy or your information, we can be contacted at: hello@spiegelandgrau.com.

Effective Date

This Privacy Policy was last updated on September 23, 2021.