

PRIVACY POLICY

For Advisory Services – as outlined @ www.invictus-adv.com “site”

Introduction

This is the Privacy Statement and Policy (“Privacy Statement”) for Invictus Advisory and its affiliates. This Privacy Policy was last updated in May 2018. For more detail on Invictus Advisory’s international operations please see www.invictus-adv.com.

Invictus Advisory understands that your privacy is important. Invictus Advisory is committed to protecting your privacy and personal information you provide or as you access and use materials on www.invictus-adv.com (the "Site"), including the Site subscription pages or other websites or apps that post a link to this Privacy Statement. In addition, information that you submit to Invictus Advisory in response to an email request for information or other outreach from Invictus Advisory, or through Invictus Advisory’s employment application processes, will be treated in accordance with this Privacy Statement.

Invictus Advisory may, in its discretion, amend this Privacy Statement from time to time. To ensure you are able to remain informed about the information we collect and how we use it, material changes to our statement will be reflected here. This Site may contain links to external sites which are not governed by this Privacy Statement. Invictus Advisory does not take responsibility for the privacy practices of any third party sites to which we link. We encourage you to review the privacy policies of any such sites before you submit information there.

YOUR ACCEPTANCE OF THIS PRIVACY STATEMENT

Please read this Privacy Statement carefully. By browsing our website and expressly consenting where required (for instance, when submitting your application), you agree to be bound by this Privacy Statement.

INFORMATION THAT WE COLLECT, AND HOW WE USE IT

What information do we collect?

Invictus Advisory collects information from you when you create your account for the Site, request copies of publications, subscribe for email newsletters and press releases, seek additional information regarding our services or employment opportunities, databases, or register for conferences and other Invictus Advisory-

sponsored events. If you do not provide such information, you will not be able to create an account for the Site, request copies of publications, subscribe for email newsletters and press releases, seek additional information regarding our services or employment opportunities.

Personal information that we collect includes: names, addresses, e-mail addresses, phone numbers, unique personal identifiers, financial information, subject areas of interest and/or demographic information.

In addition, we sometimes aggregate demographic information and the types of systems and browsers of users. Invictus Advisory also may conduct user surveys on the Web or use technologies to provide Invictus Advisory with information on a number of areas, such as user identity, user viewing habits, whether or not users found what they were searching for, whether the Site content is relevant to user needs, and the like.

How do we use personal information?

The purposes and uses of your personal information will depend on the use of the Site and the personal information provided. We process your personal information:

(i) for the purposes of safeguarding the legitimate interests pursued by Invictus Advisory. This includes:

- Informing you about updates to the service and notifying you about other products and services offered by Invictus Advisory that may be of interest to you, including information regarding publications and events
- Tailoring your experience at the Site with relevant Invictus Advisory materials
- Understanding the Site's user population, identifying subject areas of interest, and determining whether the Site is designed to work with the computer settings of a majority of our visitors
- Measuring and improving the effectiveness of Invictus Advisory marketing programs across different channels.
- Improving our web content and navigation.

(ii) on the basis of your consent. Insofar as you have granted us consent to the processing of personal information for specific purposes (for example, your application

form for employment with or through Invictus Advisory), the lawfulness of such processing is based on your consent. You may withdraw your consent at any time.

(iii) for compliance with a legal obligation. This includes anti-fraud and anti-money laundering measures as well as tax and social security requirements.

We will not sell, share, or rent or otherwise make available your personal information to other parties, except that we may disclose the information to third parties who perform services on our behalf and have a need to access the information in connection with those services. Any third parties will only process this information to the extent to which and within the limits that Invictus Advisory itself is permitted to process that data. In addition, Invictus Advisory may disclose your contact information in response to inquiries by bona-fide rights owners in connection with allegations of infringement of copyright or other proprietary rights arising from information that you have posted on the Site or otherwise provided to Invictus Advisory.

HOW WE MIGHT SHARE YOUR INFORMATION

The third parties with whom we may need to share personal information to help us provide services and products to you and to run our Website include:

- our subsidiaries or affiliates;
- our advisors;
- our third party service providers who process information on our behalf to help run some of our internal business operations including email distribution, IT services and marketing and events services;
- our business partners for publications and events co-organized by Invictus Advisory and them;
- law enforcement bodies in order to comply with any legal obligation or court order

Because Invictus Advisory is a global operating organization we need to transfer personal information which is collected on the Site or through other means across the Invictus Advisory network to help operate our business efficiently. This also includes third parties located in different countries around the world, including outside of the EEA. These arrangements may involve your personal information being located in various countries around the world e.g. USA where privacy laws differ. We only make these arrangements or transfers where we are satisfied that adequate levels of

protection are in place to protect information held in that country. In addition, the Site may be viewed and accessed anywhere in the world including countries that may not have laws regulating the use and transfer of personally identifiable information. By using the Site, submitting information through this site, or submitting personal information to Invictus Advisory through other means you voluntarily consent to such international transfer and hosting of such information to those countries and parties.

RETENTION OF YOUR PERSONAL INFORMATION

Invictus Advisory retains your personal information for so long as is necessary to fulfil the purpose for which it was collected. We may retain your personal information for longer if they may be the subject of a legal claim, or may otherwise be relevant for future litigation.

MARKETING

If, at any time, you prefer not to receive further communications from us in any or all forms you will have the ability to unsubscribe from such communications by means of e-mail. When subscribing to Invictus Advisory e-mail newsletters, you are given the opportunity to unsubscribe from such communications at any time. To unsubscribe please send us an e-mail with this request.

COOKIES AND OTHER TRACKING TECHNOLOGIES

Invictus Advisory may use cookies on this Site and in our communications with you to keep track of your visit to our Site and our communications with you. A “cookie” is a small amount of data sent from a Web server to your browser and stored on your computer’s hard drive. Other tracking technologies work similarly to cookies and place a small amount of data on your devices to monitor your website activity to allow us to collect information about how you use our Site and our services. With most internet browsers, you can erase cookies from your computer hard drive, block all cookies, or receive a warning before a cookie is stored on your computer. Please refer to your browser instructions or you can visit <https://www.aboutcookies.org/> which will give you more information. Once you have given your consent to use cookies we shall store a cookie on your computer or device to remember this for next time. If you wish to withdraw consent at any time you will need to delete our cookies using your web browsers settings. Please be advised that certain sections or functionalities of the Site may be inaccessible to you if your browser does not accept cookies. By continuing to

browse or use our Sites and services, you agree that we can store and access cookies and other tracking technologies as described herein.

SECURITY PROCESSES

Invictus Advisory has in place appropriate technological and operational security processes designed to protect personally identifiable information from loss, misuse, alteration or destruction. Only authorized employees and contractors will have access to any data provided by you, and that access is limited by need. Each employee or contractor having access to any personally-identifiable information is obligated to maintain its confidentiality. Although we take steps that are generally accepted as industry standard to protect your personally-identifiable information, Invictus Advisory cannot guarantee that your personally-identifiable information will not become accessible to unauthorized persons and Invictus Advisory cannot be responsible for any actions resulting from a breach of security when information is supplied over the internet or any public computer network.

LINKS TO OTHER WEB SITES

This website may contain links to other Web sites not operated by Invictus Advisory.

Invictus Advisory is not responsible for the privacy practices or the content of any non-Invictus Advisory web sites to which we link from the Site. We are not responsible for the protection and privacy of any information you provide whilst visiting other websites and sites not governed by our Privacy Statement. We cannot control the content or security of such websites. We cannot be held responsible for any loss or damage incurred by a user as a result of visiting such websites. No links are intended to be, nor should be construed as, an endorsement of any kind by us of that other website.

COMPLIANCE WITH LAW

Invictus Advisory complies with all applicable privacy laws and regulations. Invictus Advisory may be compelled to surrender personal user or customer information to legal authorities if presented with a court subpoena or similar legal or administrative order, or as required or permitted by the laws, rules and regulations of any nation, state or other applicable jurisdiction. Also, in the event of a violation of the terms and conditions of use of the Site or a violation of any restrictions on use of materials provided in or

through the Site, we may disclose personal user information to our affected business partners or legal authorities.

ACCESS RIGHTS

In accordance with applicable data protection laws, you have a right to request a copy of the personal information we hold about you and details of how we use that information. If any of the information held about you is incorrect or out of date, you have the right to amend or rectify it, please follow the process outlined below and we will amend our records where appropriate. You also have the right to require us to erase your personal data, stop processing your personal data, restricting the processing of your personal information, right of portability of your personal information and/or to withdraw your consent to processing. This may not apply if there are other legal justifications to continue processing. If you think we may have incorrect personal information, or would like a copy of the personal information we hold on you, or to exercise any other data protection right, please contact us. Please note that we need you to prove who you are before we can provide you with any information.

CHILDREN

Invictus Advisory understands the importance of protecting children's privacy, particularly in their online interactions. This Site is not designed for and does not intentionally target or solicit to children 18 years of age and younger.

USE OF INVICTUS ADVISORY WEB SITES

Your access to and use of the Site are subject to this Privacy Statement and certain other terms and conditions, contained in our Terms & Conditions of Use.