

WEBSITE PRIVACY POLICY

This Privacy Policy applies to our services available under the domain and subdomains <https://www.mraassociates.com/> (the “**Site**”). We recognize that privacy is important to our users, so we design and operate our Site with the protection of your privacy in mind. This Privacy Policy outlines the types of personal information we may gather when you visit our Site or use our services, as well as some of the steps we take to safeguard your information. **By visiting the Site, you agree to be bound by the terms and conditions of this Privacy Policy. If you do not agree, do not use or access the Site.**

By accepting the Privacy Policy and the Terms of Use you expressly consent to our use and disclosure of your personal information in accordance with this Privacy Policy. This Privacy Policy is incorporated into and subject to the Terms of Use.

Overview

The information we gather through our Site is protected by our general policies and procedures concerning confidentiality, proprietary data, and privacy of customer personal information. Generally, we collect non-public personal information about our clients and investors from the following sources:

- Information we receive from clients or investors on applications or other forms, including the information we collect on the Site, and
- Information about clients’ or investors’ transactions with us, our affiliates, or others.

Our policy is that:

- We do not disclose any non-public personal information about any user of our Site, our clients or investors or former clients or investors to anyone, except as permitted by law. Disclosures that are permitted by law include disclosures that are necessary to effect, administer or enforce a transaction that an investor or client requests or authorizes. Other examples of disclosures that are permitted by law are disclosures to our accountants, auditors and lawyers, disclosures to regulators that examine our business, and disclosures that clients or investors specifically request. We do not provide personal information about clients or investors to mailing list vendors or solicitors for any purpose.
- We restrict access to non-public personal information about our users, clients and investors to employees and service providers who need to know that information to provide services to our clients or to operate our business.
- We maintain physical, electronic, and procedural safeguards that comply with federal standards to guard clients’ and investors’ personal information.

Collection of Information

In general, you can browse the non-password protected sections of the Site without telling us who you are or revealing any personal information about yourself. However, we automatically track certain information that your browser makes available whenever you visit a website. This information includes your Internet Protocol address, browser type, browser language, one or more files that may uniquely identify your browser and most recent URL from which you came to our Site. We may use this information to do internal research on our users' demographics, interests, and behavior to better understand, protect, and serve you and our clients.

We also may use data collection devices such as "cookies" on certain pages of the Site to help analyze our web page flow, measure effectiveness, and promote trust and safety. Cookies are small files placed on your hard drive that assist us in providing our services. We may offer certain features that are only available through the use of a cookie. Cookies can also help us provide information that is targeted to your interests. Most cookies are "session cookies", meaning they are automatically deleted from your hard drive at the end of a session. You are always free to decline our cookies if your browser permits, although in that case you may not be able to use certain features on the Site and you may be required to reenter your password more frequently during a session.

If you apply for a password to access password-restricted areas on this Site, you must provide to us your name, email address, and any other information we request.

Use and Disclosure of Information

We use the information we collect to improve our operations and facilitate and improve the services you request. We may use information collected from you to measure interest, customize your experience, and enforce our Terms of Use. If you apply for a password, we use any data you provide to determine whether you are an accredited investor and have sufficient sophistication, investment experience, and wealth to receive information about certain investment options. We may use your information to send correspondence and perform services on your behalf in connection with investment related activities.

You agree that we may use personal information about you to analyze Site usage, improve our content and product offerings, and customize the Site's content, layout, and services. These uses improve the Site and better tailor it to meet your needs, so as to provide you with a smooth, efficient, safe, and customized experience while using the Site.

In connection with providing our services, it also may be necessary for us to share personal information about you with other third parties to help us process transactions relating to your account, including, but not limited to, asset transfers from a financial institution and processing or administering investment transactions and portfolios. In certain instances, we may contract with third parties that are not affiliated with us to perform services for us, and, if necessary, we may disclose information about you to those third parties solely for the purpose of carrying out their assigned responsibilities. In those circumstances, we require those third parties to treat your private information with the same degree of confidentiality that we do and to comply with the GDPR (defined below), as applicable. In some instances, the third-party service provider may collect

information directly from you. In these cases, you will be notified of the involvement of the service provider, and all additional information you provide them, and their additional uses will be strictly up to you. If you provide additional information to a service provider directly, their use of your personal information is governed by their applicable privacy policy.

We may also share information about you if we believe that disclosure is required under law. For example, we may need to disclose information in response to a subpoena or to cooperate with regulatory or law enforcement authorities.

We cannot ensure that all of your private communications and other personal information will never be disclosed in ways not otherwise described in this Privacy Policy. By way of example (without limiting the foregoing), we may be forced to disclose personal information to the government or third parties under certain circumstances, third parties may unlawfully intercept or access transmissions or private communications, or service providers may abuse or misuse your personal information that they collect from the Site. Therefore, although we use industry standard practices to protect your privacy, we do not promise, and you should not expect, that your personal information or private communications will always remain private.

Personal Information

You have the right to review and change or complete the information you provide to us by contacting us at info@mraassociates.com. You must promptly update your personal information if it changes or is inaccurate.

On your request, we will remove your contact information and financial information from our active databases. To make this request or if you have any questions about our use of your personal information, email info@mraassociates.com.

Our use of your personal information may be subject to the General Data Protection Regulation (697/2016/EU) (the “**GDPR**”) and any applicable local data protection legislation. All personal data collected from you will be controlled and processed in accordance with GDPR, to the extent the GDPR is applicable to such data. You have the right to data portability, to request that your personal information be erased, to restrict the processing of your personal data and to object to your data being processed for marketing and other purposes. If you object to the processing of your personal information, we will no longer process your personal information unless we can demonstrate legitimate grounds for processing such information that overrides your interests, rights, and freedoms or for the establishment, exercise, or defense of legal claims. We intend to retain in our files the personal information you have asked us to remove from our active databases to prevent fraud, resolve disputes, troubleshoot problems, assist with any investigations, enforce our Terms of Use, and comply with legal requirements. Therefore, you should not expect that your personal information will be completely removed from our databases in response to your requests. However, such personal information will only be available to select employees, service providers, and governmental persons or entities.

Security

Your information is stored on our servers located in the United States. We use procedural and technical safeguards to protect your personal information against loss or theft as well as

unauthorized access and disclosure, which may include encryption, “firewalls”, and Secure Socket Layers.

It is possible, however, that a third party will circumvent such security measures, and we do not guarantee that our security measures will successfully prevent third parties from accessing the information we collect. In the event of a security breach involving your personal information, we will make any legally required disclosures to you in the most expedient time possible and without unreasonable delay, consistent with the legitimate interests of law enforcement, or any measures necessary to determine the scope of the breach and restore the reasonable integrity of the data system.

Phishing

Identity theft and the practice currently known as “phishing” are of great concern to us. Safeguarding information to help protect you from identity theft is a top priority. We do not and will not, at any time, request your username, password, credit card information or national identification number in an unsolicited e-mail or telephone communication. For more information about phishing, visit the Federal Trade Commission’s website.

Children

Persons under the age of 18 are not eligible to use the Site. Therefore, we do not knowingly collect any personal information from persons under the age of 18.

Conditions of Use

If you choose to visit the Site, your visit and any dispute over privacy is subject to this Privacy Policy and our Terms of Use, including limitations on damages and application of the law of the State of Arizona. If you have any concern about privacy, please send a thorough description to info@mraassociates.com.

Changes to this policy

Please note this Privacy Policy may change from time to time. We may amend this Privacy Policy at any time by posting the amended terms on the Site. All amended terms shall automatically be effective 30 days after they are initially posted on the Site. Your continued use of the Site constitutes your agreement to this Privacy Policy and any changes to this Privacy Policy. If we make any material changes to this Privacy Policy that affect your information already stored in our database, we will post a prominent notice on the Site stating that this Privacy Policy has changed. If you do not agree with this Privacy Policy or any changes to the Privacy Policy, please do not use or access the Site.

If you have any additional questions, please feel free to contact us any time at info@mraassociates.com.

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