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## **PRIVACY POLICY**

SMART MONEY COMMERCIAL BROKERS LLC (“we”, “us”, “our website” or “the company”) respects your privacy and is committed to protecting it through this Privacy Policy.

This Privacy Policy governs your access to and use of sm-otc.io (the “Website”), including any content, functionality and services offered on or through the Website, whether as a guest, subscriber, a partner or a paying Client.

When accessing the Website, the Company will learn certain information about you, both automatically and through voluntary actions you may take, during your visit. This policy applies to information we collect on the Website and in email, text, or other electronic messages between you and the Website. Please read the Privacy Policy carefully before you start to use the Website.

By using the Website or by clicking to accept or agree to the Terms of Use, if or when this option is made available to you, you accept and agree to be bound and abide by the Privacy Policy.

If you do not want to agree to the Privacy Policy, you must not access or use the Website.

## **INFORMATION ABOUT YOU**

When you access the Website, we will learn certain information about you during your visit.



### **Information You Provide To Us**

The Website may host various places for users to provide information. We may collect information that users provide by filling out forms on the Website, communicating with us via contact forms, responding to surveys, completing quizzes, performing search queries using our search feature, providing comments or other feedback via social media, initiating messaging interactions and providing information when ordering a product or service via the Website. We use information you provide to us to respond to you questions, deliver the requested product and/or service, to improve our overall performance, and to provide you with offers, promotions, and information.

### **Information We Collect Through Automatic Data Collection Technology**

As you navigate through our Website, we may use automatic data collection technologies, including Google Analytics, to collect certain information about your equipment, browsing actions, and patterns. This will generally include information about your location, your traffic pattern through our website, and any communications between your computer and our Website. Among other things, we may collect data about the type of computer you use, your IP address, your operating system, and your browser type. The information we collect automatically is used for statistical data and will not include personal information.



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We use this data to improve our Website and our service offerings.

To the extent that you voluntarily provide personal information to us, our systems will associate the automatically collected information with your personal information.

### **Use of Cookies and Pixels**

Similar to other commercial websites, our Website utilizes a standard technology called “cookies” and server logs to collect information about how our site is used. Information gathered through cookies and server logs may include the date and time of visits, the pages viewed, time spent at our site, and the websites visited just before and just after our own, as well as your IP address.

A cookie is a very small text document, which often includes an anonymous unique identifier. When you visit a website, that site’s computer asks your computer for permission to store this file in a part of your hard drive specifically designated for cookies. Each website can send its own cookie to your browser if your browser’s preferences allow it, but (to protect your privacy) your browser only permits a website to access the cookies it has already sent to you, not the cookies sent to you by other sites.

The Company reserves the right to use technological equivalents of cookies, including social media pixels. These pixels allow social media sites to track visitors to outside websites so as to tailor advertising messages users see while visiting that social media website. The Company reserves the right to use these pixels in compliance with the policies of the various social media sites, where you may be registered.

### **Electronic Communications Information**



If you choose to correspond with us through email, SMS or digital messenger (“Electronic Communications”), we may retain the content of your messages together with your email address, phone number or user name and our responses. We provide the same protections for these Electronic Communications that we employ in the maintenance of information received online, mail, and telephone. This also applies when you register for our website, sign up through any of our forms using your email address or make a purchase on this site. For further information see the email policies below.

### **Email Policies**

We are committed to keeping your e-mail address confidential. We do not sell, rent, or lease our subscription lists to third parties, and will not disclose your email address to any third parties except as allowed in the section titled Disclosure of Your Information.

All e-mails sent from our organization will clearly state who the e-mail is from and provide clear information on how to contact the sender. In addition, all e-mail messages will also contain concise information on how to remove yourself from our mailing list so that you receive no further e-mail



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communication from us. We will maintain the information you send via e-mail to us in accordance with applicable laws. All our company emails where we may receive your email messages are protected by 2-factor authentication. Our emails provide users the opportunity to opt-out of receiving communications from us by reading the unsubscribe instructions located at the bottom of any e-mail they receive from us at any time.

### **Why We Collect Information**

The Company collects your information in order to record and support your participation in the activities you select. If you register to download a resource, sign up for our newsletter, and/or purchase a product from us, we collect your information. We use this information to track your preferences and to keep you informed about the products and services you have selected to receive and any related products and/or services. As a visitor to this Website, you can engage in most activities without providing any personal information. It is only when you seek to download resources and/or register for services that you are required to provide information.



### **How Do We Use the Information That You Provide to Us?**

We use personal information for purposes of presenting our Website and its contents to you, providing you with information, providing you with offers for products and services, carrying out any contract between you and the Company, administering our business activities, providing customer service, and making available other items and services to our customers and prospective customers. From time-to-time, we may use the information you provide to us to display advertisements to you that are tailored to your personal characteristics, interests, and activities, or the products you previously purchased from us.

### **Disclosure of Your Information**

As a general rule, we do not sell, rent, lease or otherwise transfer any information collected whether automatically or through your voluntary action. We may disclose your personal information to our service providers (e.g. payments services providers, email service provider) for the purpose of providing our services to you. We may disclose your personal information to a third party, including a lawyer or collection agency, when necessary to enforce our terms of our service or any other agreement between you and the Company. We may provide your information to any successor in interest in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of the Company's assets and/or business. We may disclose information when legally compelled to do so, in other words, when we, in good faith, believe that the law requires it or for the protection of our legal rights or when compelled by a court or other governmental entity to do so.



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## **How Do We Protect Your Information and Secure Information Transmissions?**

We employ commercially reasonable methods to ensure the security of the information you provide to us and the information we collect automatically. This includes using standard security protocols and working only with reputable third-party vendors and enforcing 2-factor authentication for accessing all critical tools that we use.

Email is not recognized as a secure medium of communication. For this reason, we request that you do not send private information to us by email. However, doing so is allowed, but at your own risk. Some of the information you may enter on our website may be transmitted securely via a secure medium known as Secure Sockets Layer, or SSL.

Credit Card information and other sensitive information should be never transmitted via email.

The Company may use software programs to create summary statistics, which are used for such purposes as assessing the number of visitors to the different sections of our site, what information is of most and least interest, determining technical design specifications, and identifying system performance or problem areas. For site security purposes and to ensure that this service remains available to all users, the Company uses software programs to monitor network traffic to identify unauthorized attempts to upload or change information, or otherwise cause damage.



## **Policy Changes**

It is our policy to post any changes we make to our privacy policy on this page. If we make material changes to how we treat our users' personal information, for example, if we change one of our service providers, we will notify you by email to the email address specified by you and/or through a notice on the Website home page. The date the privacy policy was last revised is identified at the bottom of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our Website and this privacy policy to check for any changes.

## **Your Rights**

You have the right to request us about your personal data we store, and you can request us to either rectify, amend or erase some of your personal data. Please note, that your request to erase the data is not absolute. For example, if you are a paying customer, we will be obliged to keep some of your information, in order to comply with applicable accounting and tax reporting requirements. At the same time, if we believe we can satisfy your request to erase your personal data, we will do so, and that would mean that we will not store or have access to any of the data we previously may have collected from or about you.



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If you have any questions in relation to our Privacy Policy, we welcome your questions or comments, please, feel free to contact us at: [info@sm-otc.io](mailto:info@sm-otc.io).