



## **Econoday, Inc Privacy Policy Updated May 1, 2018**

This Privacy Policy applies to information that website visitors transmit to Econoday, Inc. ("ECONODAY") through this website, [www.Econoday.com](http://www.Econoday.com). Our website allows visitors to learn About Us and its products and services ("Visitors"). Our website is also used by ECONODAY's Clients to access ECONODAY's products and services ("Clients").

Visitors and Clients may submit non-public, personal information through this website. We have developed this Privacy Policy to set forth our policies and practices regarding our use and disclosure of such non-public, personal information submitted through our website.

### **1. Gathering and Use of Information.**

**a. General Visitors to our Site.** ECONODAY collects information voluntarily provided from our Visitors through our website. However, we do not require Visitors to submit personal information to obtain general access to our website. Information that is collected is used in the aggregate to improve our services and to better serve client's software needs by providing ECONODAY with valuable information about interests in our products and services. Certain pages of ECONODAY's website contain forms that allow a Visitor to request information about our services and solutions. In completing a form, you may be required to provide contact information, such as name, phone number and email address. Please note that any information submitted implies consent for use of the information, and ECONODAY may use the information from these forms to respond to requests and send information requested. ECONODAY will not rent, sell or disclose the information collected, including email addresses, to third parties. If you elect to subscribe to our services, you will be required to complete a Subscription and Use Agreement. We ask for your credit card and billing information. Billing information is used to verify your credit card information.

**b. Clients Use of our Site.** Upon completing the subscription enrollment process, you will have access to ECONODAY's investment management tools as a client. Use of the tools may involve the submission of non-public, personal information. We protect such information by placing it on the secure portion of our dedicated servers. That's why you have to enter a unique user name and password each time you want to access your information. Your Password should never be shared with anyone.

When our system asks you to enter non-public, personal information, that information is protected with the Secure Sockets Layer (SSL) protocol, with a minimum of 128-bit encryption, which is the



industry standard for secure data transfer software. Its proven protection is among the best software available today for secure online commerce transactions. This technology scrambles your personal information as it moves between your computer's browser and ECONODAY's computer systems. SSL is used by most websites, including online banking sites and other consumer retail sites to protect your information. While you are on a secure page, the padlock icon is visible in your browser and is shown as locked, as opposed to unlocked, or open, when you are just 'surfing'.

Our site is hosted at a secure, offsite facility that provides server security, physical security, and network security. These include certified Cisco firewalls, dedicated intrusion detection systems, and 24/7 monitoring. Data you send us are stored securely on-site and backed up daily to remote storage in compliance with industry best practices.

## **2. Sharing of Nonpublic Personal Information**

We do not share non-public, personal information with any third parties. However, we reserve the right to share such information with a third party, only to the extent that the participation of the third party is necessary to provide our services to you. In the event we contract with a third party to help us provide our services to you, our agreement with the third party will expressly prohibit the third party from using your nonpublic personal information for any purpose other than assisting us in providing our services to you.

Additionally, we reserve the right to disclose information as required by law and when we believe that disclosure is necessary to protect our rights and/or comply with a judicial proceeding, court order, or legal process served on our Web site. As stated above, we will not sell, share, or rent this information to others in any way different from what is disclosed in this statement.

## **3. Use of Cookies and Log Files**

Cookies are pieces of data assigned by a Web server to your browser. Cookies help websites to keep track of your preferences and to recognize return visitors. So, when you return to a website you've visited before, your browser gives this data back to the server. Cookies do not contain viruses and most cannot reveal any personally identifiable information about you unless you willingly provide it as a user on a site.

ECONODAY uses cookies to make your online experience richer and more personalized. As a matter of security, we do not embed personal information in our cookies, other than the email address used for purposes of logging in.



To manage our website, we may anonymously log information on our operational systems. We identify categories of visitors by items such as domains and browser types to report these statistics in the aggregate to our webmasters. We do this in an effort to present visitors the best web experience. It also is an effective information resource.

### **3. Use of the Internet**

Although ECONODAY will use all reasonable efforts to safeguard the confidentiality of the data including non-public, personal information, transmissions made by means of the Internet cannot be made absolutely secure. ECONODAY will have no liability for disclosure of data due to errors in transmission, unauthorized acts of third parties or through the use of third party cookies including those of advertisers when you view or click on their advertisements. Once you leave the website, you will be subject to third party privacy policies, which may differ significantly from our Privacy Policy.

### **4. Links**

The website may contain "links" to other websites. We recommend that you check the specific privacy policy of any site before providing any personal information.

### **5. Changes to this Policy**

Econoday reserves the right to change or update this Privacy Policy at any time. Any changes or updates will be effective immediately upon posting to the website, and your use of the website following such posting constitutes your acceptance of the Privacy Policy as so changed or updated.