

**Privacy Policy**  
**Last Updated: January 30<sup>th</sup>, 2019**

Somera Capital Management (“Somera” or “we” or “us”) has a strong commitment to providing excellent service to all of our customers (“Users” or “you”), including respecting their concerns about privacy. We understand that visitors to our website may have questions about whether and how this website collects and uses information, and are committed to protecting your privacy. In support of this, we only use the personally identifiable information (“personal information” or “personal information”) that you provide in accordance with the terms outlined below.

This Privacy Policy (“Policy”) covers any personal information we obtain when you visit us, use our services, or access the features on the websites that Somera owns or control (today or in the future), including <https://www.someracapital.com> and <https://invest.someracapital.com> (the “Sites”). You can access the Sites in many ways, including from a computer or mobile phone, and this Policy will apply regardless of the means of access. This Policy also governs the use of personal information we obtain from you from any third party site or application where we post content or invite your feedback or participation, including (“Third Party Sites”). Somera cannot control the privacy policies or practices of Third Party Sites or of companies Somera does not own or control, and cannot control the actions of people Somera does not employ or manage. You should always check the privacy policies of Third Party Sites and your privacy settings.

## **1. Information We Collect**

### **Personal Information**

You may be asked for, as appropriate:

- name;
- username;
- email address;
- mailing address;
- social security or national identification number;
- date of birth;
- bank account information; and
- phone number.

You may, however, visit our Sites anonymously. We will collect personal information from you only if you voluntarily submit such information to us. You can always refuse to supply personal information, except that it may prevent you from engaging in certain activities on the Sites.

### **Usage Information**

We may also use cookies and other technologies (which are described below) to automatically gather information about how you use the Sites, including:

- IP address;
- the type of computer or mobile device you are using;

- platform type (like Apple iOS or Android);
- your operating system version;
- your mobile device's identifiers, like your MAC Address, Apple Identifier For Advertising (IDFA), and/or Android Advertising ID (AAID);
- application performance and de-bugging information;
- your browser type and language;
- referring and exit pages, and URLs;
- the number of clicks on a web page;
- the amount of time spent on a web page; and/or
- the date and time of activity on our Sites.

### Non-personal Information

We may collect non-personal identification information about you whenever you interact with our Sites. Non-personal identification information may include the browser name, the type of computer and technical information about your means of connection to our Sites, such as the operating system, the Internet service providers utilized, and other similar information.

## **2. How We Collect Information**

We may collect personal information from you in a variety of ways, including when you:

- visit our Sites;
- create an account;
- request information;
- make a transaction or investment;
- subscribe to our client updates; and
- fill out a form or otherwise provide it to us.

We also collect personal information from you in connection with other activities, services, features or resources we make available on our Sites.

### Web Browser Cookies

We collect information about how you use our Sites by setting and accessing cookies on your computer. A cookie is a small piece of information sent by our Sites that is saved on your hard drive by your computer's browser. The cookie holds information our Sites may need to personalize or enhance your experience and to gather statistical data, such as which pages are visited, the Internet provider's domain name and the addresses of the sites visited immediately before coming to and immediately after leaving the Sites. The information in the cookie lets Somera trace "clickstream" activity (i.e., the paths taken by visitors to our Sites as they move from page to page) to enable us to better serve our customers by revealing which portions of our Sites are the most popular. We may link the anonymous visitor ID from your cookie to a user ID in our database to help us analyze web traffic and statistics. From time to time, other companies may help us with data research and analysis, but they will be prohibited from using that data for any other purpose. You may disable cookies on your browser. Please review your browser's

instructions for doing so. Note that certain features of the Sites may not be available if you delete or reject cookies.

### Pixel Tags

We may use pixel tags (also called web beacons or clear gifs) on our Sites. They can help us analyze what our customers like to do on our Sites and the effectiveness of our features and advertising. They can also help us customize your browsing experience. We may use information collected through pixel tags or tracked links in combination with your personal information. We may also combine personal information you provide to Somera with other personal information (such as purchase history and demographic information). If we work with other companies to help us track, collect and analyze this information, they will be prohibited from using this information for any other purpose.

### Google Analytics

This Site uses Google Analytics (and in the future may use other similar sites or services), a web analytics service provided by Google, Inc. (“Google”), to better assist Somera in understanding how the Site is used. Google Analytics will place cookies on your computer that will generate information that we select about your use of the Site, including your computer’s IP address. That information will be transmitted to and stored by Google. The information will be used for the purpose of evaluating consumer use of the Site, compiling reports on Site activity for Somera’s use, and providing other services relating to Site activity and usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google’s behalf. You may refuse the use of cookies by selecting the appropriate settings on your browser. Please note that by doing so, you may not be able to use the full functionality of the Site. The use of cookies by Google Analytics is covered by Google’s privacy policy.

You can learn more about Google’s practices at <http://www.google.com/policies/privacy/partners> and view its currently available opt-out options at <https://tools.google.com/dlpage/gaoptout>.

### **3. How We Use Collected Information**

Somera collects and uses your personal information for the following purposes:

- To personalize User experience;
- To validate your identity
- To satisfy contractual obligations;
- To prevent fraud;
- To conduct statistical or demographic analysis;
- To facilitate advice, counseling, and investments;
- To improve our Sites; and
- To improve customer service.

We may also use information in the aggregate to understand how our Users as a group use the services and resources provided on our Sites.

#### **4. How We Protect Your Information**

We take every reasonable precaution to keep your personal information secure. We have put in place appropriate physical, electronic and managerial procedures to safeguard the information we collect. Nevertheless, when disclosing any personal information, you should remain mindful that there is an inherent risk in the use of email and the internet.

#### **5. Sharing Your Personal Information**

We may share your information with third parties:

- to help us operate our business and the Sites or administer activities on our behalf, such as sending out client updates;
- to protect payment transactions against fraud or identity theft;
- to provide you with offers and marketing that may be of interest to you (with your consent when necessary);
- to respond to a question you submit or facilitate a request from you as required;
- and to verify your background and credentials if you apply for a job.

We may also share the information we collect with our business partners and other third parties for: (1) non-marketing Purposes, and (2) joint marketing purposes.

When we provide personal information to our third-party business partners, we require them to exercise reasonable care to protect your personal information and restrict the use of your personal information to the purposes for which it was provided to them. If you do not want us to share your personal information with third parties for marketing purposes, you may opt-out of such sharing by sending an email to [privacy@someracapital.com](mailto:privacy@someracapital.com) with the phrase “Privacy Opt-out: Somera Information Sharing.”

#### **6. Third Party Websites**

You may find advertising or other content on our Sites that link to the sites and services of our partners, suppliers, advertisers, sponsors, licensors and other third parties. We do not control the content or links that appear on these sites and are not responsible for the practices employed by websites linked to or from our Sites. In addition, these sites or services, including their content and links, may be constantly changing. These sites and services may have their own privacy policies and customer service policies. Browsing and interaction on any other website, including websites which have a link to our Sites, is subject to that website’s own terms and policies.

#### **7. Managing Your Information**

You may decline to share certain information with us, in which case we may not be able to provide to you some of the features and functionality found on the Sites.

To protect your privacy and security, we take reasonable steps to verify your identity before granting you account access or making corrections to your information. You are responsible for maintaining the secrecy of your unique password and account information at all times.

Email Opt Out

From time to time (and with your consent when required), you may receive periodic mailings, or e-mails from us with news or other information on events, products, services, discounts, special promotions, upcoming events or other offers from or on our behalf. If at any time you wish to stop receiving emails or mailings from us please send us an email to [privacy@someracapital.com](mailto:privacy@someracapital.com) with the phrase “Privacy Opt-out: Somera Social Mailings” in the subject line, or write to us at the address provided below, and we will remove you from our mailing list.

Alternatively, for e-mail communications, you may opt out of receiving such communications by following the unsubscribe instructions set forth in most promotional e-mail messages from us. Your unsubscribe request or e-mail preferences change will be processed promptly, though this process may take several days. During that processing period, you may receive additional promotional emails from us.

Other Rights

You have the right to limit how we share some of your personal information. The following chart provides details about your choices:

<b>Reasons we can share your Personal Information</b>	<b>Does Somera Share?</b>	<b>Can you limit this sharing?</b>
<b>For our everyday business purposes—</b> such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
<b>For our marketing purposes—</b> to offer our products and services to you	Yes	Yes
<b>For joint marketing with other financial companies</b>	Yes	Yes
<b>For our affiliates’ everyday business purposes—</b> information about your transactions and experiences	Yes	No
<b>For our affiliates to market to you</b>	No	We do not share

<b>For nonaffiliates to market to you</b>	No	We do not share
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To limit information sharing, please email us at [privacy@someracapital.com](mailto:privacy@someracapital.com).

### **8. Notice to International Users**

At this time, our Site is based in and primarily intended for residents of the United States. If you are not a resident of the United States, you may contact us at [privacy@someracapital.com](mailto:privacy@someracapital.com) if you have any questions or requests regarding your personal information.

### **9. California Privacy Rights**

If you are a California resident, you have the right to request information from us regarding the manner in which Somera shares certain categories of personal information with third parties for their direct marketing purposes, in addition to the rights set forth above. Under California law, you have the right to send us a request at the designated address listed below to receive the following information:

- The categories of information we disclosed to third parties for their direct marketing purposes during the preceding calendar year;
- the names and addresses of the third parties that received the information; and
- if the nature of the third party’s business cannot be determined from their name, examples of the products or services marketed.

This information may be provided in a standardized format that is not specific to you. The designated email address for these requests is: [privacy@someracapital.com](mailto:privacy@someracapital.com).

Also, please note that we have not yet developed a response to browser “Do Not Track” signals, and do not change any of our data collection practices when we receive such signals. We will continue to evaluate potential responses to “Do Not Track” signals in light of industry developments or legal changes.

### **10. Your Consent and Updates to this Policy**

You acknowledge that this Policy is part of the Terms and Conditions for your use of the Sites, and you agree that using the Sites signifies your assent to Somera’s Policy. Somera reserves the right to change this Policy at any time. If we decide to change our Policy, we will post those changes on this page so that you are always aware of what information we collect, how we use it and under what circumstances we disclose it. As we may make changes from time to time without notifying you, we suggest that you periodically consult this Policy. Your continued use of the Sites after the effective date of any modification to the Policy will be deemed to be your agreement to the changed terms.

If you have any questions about your privacy or security on our Sites, please contact us using the following information:

Somera Capital Management  
115 West Canon Perdido Street  
Santa Barbara, CA 93101

or email us at:

[privacy@someracapital.com](mailto:privacy@someracapital.com)