

## **PRIVACY POLICY**

Effective Date: February 1, 2016

You have arrived at [www.renewalfunds.com](http://www.renewalfunds.com) (the "Web Site"), which is owned and operated by Renewal Funds Management Company, Ltd (the "Company"). Throughout this Privacy Policy the words "we," "us," and "our" refer to the Company and its affiliates, and the words "you" and "your" refer to the user visiting the Web Site and your organization. This Privacy Policy applies to information that we collect at the Web Site (including any mobile version) and our handling of such information. This Privacy Policy does not apply to our data collection activities offline or otherwise outside of the Web Site (unless otherwise stated below). Please review the Web Site's Terms of Use, which governs your use of the Web Site.

***By accessing and using the Web Site, you consent to our Privacy Policy, our Terms of Use and our collection, use and sharing of your information and data, and other activities, as described below.***

### **1. What Information Does the Web Site Collect?**

#### **(a) Information You Provide to Us**

**Personal Information.** We may ask you to provide us with your personally identifiable information, which is information that identifies you personally, such as your first and last name, telephone number and e-mail address ("Personal Information"). We may collect this Personal Information through various forms and in various places on the Web Site, including account registration forms, contact us forms, or when you otherwise interact with the Web Site.

#### **(b) Information Collected or Stored As You Access and Use the Web Site**

In addition to any Personal Information or other information that you choose to submit to us via the Web Site, we and our third-party service providers may use a variety of technologies that automatically (or passively) store or collect certain information whenever you visit or interact with the Web Site ("Usage Information"). This Usage Information may be stored or accessed using a variety of technologies that may be downloaded to your personal computer, browser, laptop, tablet, mobile phone or other device (a "Device") whenever you visit or interact with the Web Site. To the extent we associate Usage Information with your Personal Information that we collect directly from you on the Web Site, we will treat it as Personal Information.

This Usage Information may include:

- your IP address, UDID or other unique identifier ("Device Identifier"). A Device Identifier is a number that is automatically assigned to your Device used to access the Web Site, and our computers identify your Device by its Device Identifier;
- your Device functionality (including browser, operating system, hardware, mobile network information);
- the URL that referred you to the Web Site;
- the areas within the Web Site that you visit and your activities there, including remembering you and your preferences;
- your Device location;

- your Device characteristics; and
- certain other Device data, including the time of day, among other information.

**Tracking Technologies.** We may use various methods and technologies to store or collect Usage Information (“Tracking Technologies”). Tracking Technologies may set, change, alter or modify settings or configurations on your Device. A few of the Tracking Technologies include, without limitation, the following (and subsequent technology and methods later developed):

**Cookies.** A cookie is a data file placed on a Device when it is used to visit a web site. A Flash cookie (or locally shared object) is a data file placed on a Device via the Adobe Flash plug-in that may be built-in to or downloaded by you to your Device. HTML5 cookies can be programmed through HTML5 local storage.

**Web Beacons.** Small graphic images or other web programming code called web beacons (also known as “1x1 GIFs” or “clear GIFs”) may be included in the Web Site’s pages and messages. Web beacons may be invisible to you, but any electronic image or other web programming code inserted into a page or e-mail can act as a web beacon. Web beacons or similar technologies may be used for a number of purposes, including, without limitation, to count visitors to the Web Site, to monitor how users navigate the Web Site, to count how many e-mails that were sent were actually opened or to count how many particular articles or links were actually viewed.

**Embedded Scripts.** An embedded script is programming code that is designed to collect information about your interactions with a web site, such as the links you click on. The code is temporarily downloaded onto your Device from a web server or a third-party service provider, is active only while you are connected to the relevant site, and is deactivated or deleted thereafter.

**Browser Fingerprinting.** Collection and analysis of information from your Device, such as, without limitation, your operating system, plug-ins, system fonts and other data, for purposes of identification, is known as browser fingerprinting.

**Etag, or Entity Tag.** An ETag is a feature of the cache in browsers. It is an opaque identifier assigned by a web server to a specific version of a resource found at a URL. If the resource content at that URL ever changes, a new and different ETag is assigned. Used in this manner ETags are a form of Device Identifier. ETag tracking may generate unique tracking values even where the consumer blocks HTTP, Flash, and/or HTML5 cookies.

**Recognition Technologies.** Recognition technologies are technologies, including application of statistical probability to data sets, which attempt to recognize or make assumptions about users and devices (e.g., that a user of multiple devices in the same user).

**Tracking Technologies Usage.** We may use Tracking Technologies for a variety of purposes, including:

**Strictly Necessary.** We may use cookies or other Tracking Technologies that we consider are strictly necessary to allow you to use and access the Web Site, including cookies required to prevent fraudulent activity and improve security.

**Performance-Related.** We may use cookies or other Tracking Technologies that are useful in order to assess the performance of the Web Site, including as part of our analytic practices or otherwise to improve the content, products or services offered through the Web Site.

**Functionality-Related.** We may use cookies or other Tracking Technologies that are required to offer you enhanced functionality when accessing the Web Site, including identifying you when you visit the Web Site

or keeping track of your specified preferences, including in terms of the presentation of content on the Web Site.

**Targeting-Related.** We may use Tracking Technologies to deliver content relevant to your interests on the Web Site and third-party sites based on how you interact with our content. This includes using Tracking Technologies to understand the usefulness to you of the content that has been delivered to you.

### **Tracking Technologies Choices and Consent.**

We obtain your consent to our information storage or collection Tracking Technologies by providing you with transparent information in our Privacy Policy and providing you with the opportunity to make a choice to disable cookies as set forth above. Please note that we are not required to obtain your consent to the information collection Tracking Technologies identified above that are strictly necessary.

We are giving you detailed notice of the Tracking Technologies and your limited choices regarding them so that your consent is meaningfully informed.

### **Third Party Tracking and “Do Not Track.”**

There may be other Tracking Technologies now and later devised and used by us in connection with the Web Site. Further, third parties may use Tracking Technologies in connection with the Web Site, which may include the collection of information about your online activities over time and across third-party web sites or online services. We may not control those Tracking Technologies and we are not responsible for them. You consent, however, to potentially encountering third-party Tracking Technologies in connection with use of the Web Site and accept that our statements under this Privacy Policy do not apply to the Tracking Technologies or practices of such third parties. Also, various third parties are developing or have developed signals or other mechanisms for the expression of consumer choice regarding the collection of information about an individual consumer’s online activities over time and across third-party web sites or online services (e.g., browser do not track signals). Currently, we do not monitor or take any action with respect to these signals or other mechanisms.

#### **(c) Information Third Parties Provide About You**

We may, from time to time, supplement the information we collect directly from you on the Web Site with outside records from third parties for various purposes, including to enhance our ability to serve you, to tailor our content to you and to offer you opportunities that may be of interest to you. To the extent we combine information we receive from those sources with Personal Information we collect on the Web Site, it will be treated as Personal Information and we will apply this Privacy Policy to such combined information, unless we have disclosed otherwise. In no other circumstances do our statements under this Privacy Policy apply to information we receive about you from third parties, even if they have used our technology to collect it and share it with us.

#### **(d) Interactions with Third-Party Sites**

The Web Site may include functionality that allows certain kinds of interactions between the Web Site and a third-party web site or application. The use of this functionality may involve the third-party operator providing certain information, including Personal Information, to us. If we offer and you choose to use this functionality to access or use the Web Site, the third-party site or application may send Personal Information about you to us. If so, we will then treat it as Personal Information under this Privacy Policy, since we are collecting it as a result of your accessing of, and interaction on, the Web Site. In addition, we may provide third-party sites’ interfaces or links on the Web Site to facilitate you sending a communication from the Web Site. These third parties may retain any information used or provided in any such communications or other

activities and these third parties' practices are not subject to our Privacy Policy. The Company may not control or have access to your communications through these third parties. Further, when you use third-party sites or services, you are using their services and not our services and they, not we, are responsible for their practices. You should review the applicable third-party privacy policies before using such third-party tools on the Web Site.

## **2. How Do We Use the Information Collected?**

**Generally.** We may use your Personal Information or Usage Information that we collect about you: (1) to provide you with information or services or process transactions that you have requested or agreed to receive, including to send you electronic newsletters, or to provide you with special offers or promotional materials on behalf of us or third parties; (2) to enable you to participate in a variety of the Web Site's features; (3) to process any inquiry, including verifying your information is active and valid; (4) to improve the Web Site or create new service offerings, to customize your experience on the Web Site, or to serve you specific content that is most relevant to you; (5) to contact you with regard to your use of any of the Web Site and, in our discretion, changes to the Web Site and/or any of the Web Site's policies; (6) for internal business purposes; and (7) for purposes disclosed at the time you provide your information or as otherwise set forth in this Privacy Policy.

**Contact Us.** Please note that information submitted to the Web Site via a "contact us" or other similar customer inquiry function may not receive a response. We will not use the information provided by you in a customer inquiry communication to contact you for marketing purposes unrelated to your request unless you agree otherwise.

## **3. How and When Do We Share Information with Third Parties?**

We may share non-Personal Information, such as aggregated user statistics, with third parties. We may share your Device Identifiers with third parties along with data related to you and your activities. We do not share your Personal Information with third parties for those third parties' direct marketing purposes unless we have given you the choice to consent or withhold consent to such sharing at the time you provide your Personal Information, in which case we will honor your choice. If we de-identify data about you, it is not treated as Personal Information by us, and we may share it with others freely. In addition, we may share the information we have collected about you, including Personal Information, as disclosed at the time you provide your information and as described below or otherwise in this Privacy Policy. The Company may also disclose your information as follows:

**(a) When You Request Information From or Provide Information to Third Parties.** You may be presented with an option on the Web Site to receive certain information and/or marketing offers directly from third parties or to have us send certain information to third parties or give them access to it. If you choose to do so, your Personal Information and other information may be disclosed to such third parties and all information you disclose will be subject to the third-party privacy policies and practices of such third parties.

**(b) Third Parties Providing Web Sites on Our Behalf.** We may use third-party vendors to perform certain services on behalf of us or the Web Site, such as hosting the Web Site, designing and/or operating the Web Site's features, tracking the Web Site's activities and analytics, and enabling us to send you special offers or perform other administrative services. We may provide these vendors with access to user information, including Device Identifiers and Personal Information, to carry out the services they are performing for you or for us. Third-party analytics and other service providers may set and access their own Tracking Technologies on your Device and they may otherwise collect or have access to information about you, potentially including Personal Information, about you. We are not responsible for those third party technologies or activities arising out of them, nor are we responsible for the effectiveness of or compliance with any third parties' opt-out options.

**(c) To Protect the Rights of the Company and Others.** To the fullest extent permitted by applicable law, we may also disclose your information if we believe in good faith that doing so is necessary or appropriate to: (i) protect or defend the rights, safety or property of the Company or third parties (including through the enforcement of this Privacy Policy, our Terms of Use, and other applicable agreements and policies); or (ii) comply with legal and regulatory obligations (e.g., pursuant to law enforcement inquiries, subpoenas or court orders). To the fullest extent permitted by applicable law, we have complete discretion in electing to make or not make such disclosures, and to contest or not contest requests for such disclosures, all without notice to you.

**(d) Affiliates and Business Transfer.** We may share your Personal Information with our parent, subsidiaries and affiliates. We also reserve the right to disclose and transfer all such information: (i) to a subsequent owner, co-owner or operator of the Web Site or applicable database; or (ii) in connection with a merger, consolidation, restructuring, the sale of substantially all of our interests and/or assets or other corporate change, including, during the course of any due diligence process.

#### **4. Do Third-Party Content or Links To Third-Party Sites Appear on the Web Site?**

The Web Site may contain content that is supplied by a third party, and those third parties may collect Usage Information and your Device Identifier when pages from the Web Site are served to you. In addition, when you are on the Web Site you may be directed to other services that are operated and controlled by third parties that we do not control. We are not responsible for the data collection and privacy practices employed by any of these third parties or their services and they may be tracking you across multiple sites and may be sharing the results of that tracking with us and/or others. For example, if you “click” on a link, the “click” may take you off the Web Site onto a different site. These other sites may associate their Tracking Technologies with you, independently collect data about you, including Personal Information, and may or may not have their own published privacy policies. We encourage you to note when you leave the Web Site and to review the third-party privacy policies of all third-party websites and exercise caution in connection with them.

#### **5. How Do I Change My Information and Communications Preferences?**

You are responsible for maintaining the accuracy of the information you submit to us, such as your contact information. The Web Site may allow you to review, correct or update Personal Information you have provided, and you may provide updates and changes by contacting us at [elyse@renewalfunds.com](mailto:elyse@renewalfunds.com). If you request updates or changes to provided Personal Information, we will make good faith efforts to make the requested changes in our then active databases as soon as reasonably practicable (but we may retain prior information as business records). Please note that it is not always possible to completely remove or delete all of your information from our databases and that residual data may remain on backup media or for other reasons. When you edit your Personal Information or change your preferences on the Web Site, information that you remove may persist internally for the Company’s administrative purposes. You may cancel or modify our e-mail marketing communications you receive from us by following the instructions contained within our promotional e-mails. This will not affect subsequent subscriptions and if your opt-out is limited to certain types of e-mails the opt-out will be so limited. Please note that we reserve the right to send you certain communications relating to your use of our Web Site, such as administrative and service announcements and these transactional account messages may be unaffected if you choose to opt-out from receiving our marketing communications. If you have any questions about the Privacy Policy or practices described in it, you should contact us in the following ways: Postal Mail: Renewal Funds, 500-163 W Hastings Street, Vancouver BC, V6B 1H5; By e-mail [elyse@renewalfunds.com](mailto:elyse@renewalfunds.com).

## **6. What About Transfer of Information to the United States?**

The Web Site is operated in the United States and intended for users located in the United States. If you are located outside of the United States, please be aware that information we collect through the Web site, including Personal Information, will be transferred to, and processed, stored and used in the United States, but Company may also access and use, but not store, such information, including Personal Information, from locations outside of the United States. The data protection laws in the United States may differ from those of the country in which you are located, and your Personal Information may be subject to access requests from governments, courts, or law enforcement in the United States according to laws of the United States. By using the Web Site or providing us with any information, you consent to the transfer to, and processing, usage, sharing and storage of your information, including Personal Information, in the United States as set forth in this Privacy Policy.

## **7. What Should Parents Know About Children?**

We understand the importance of protecting children's privacy in the interactive world. We are a general audience service and do not use the Web Site to knowingly collect personal information from children under the age of thirteen (13) that requires parental notice and consent under the Children's Online Privacy Protection Act ("COPPA") without such parental consent. **If you are a child under 13 years of age, you are not permitted to use the Site and should not send any information about yourself to us through the Web Site.**

In the event that we become aware that we have collected personal information from any child, we will dispose of that information in accordance with COPPA and other applicable laws and regulations. If you are a parent or guardian and you believe that your child under the age of 13 has provided us with personal information without COPPA-required consent, please contact us at [elyse@renewalfunds.com](mailto:elyse@renewalfunds.com)

## **8. What About Security?**

We endeavor to incorporate commercially reasonable safeguards to help protect and secure your Personal Information. However, no data transmission over the Internet, mobile networks, wireless transmission or electronic storage of information can be guaranteed to be 100% secure. Please note that we cannot ensure the security of any information you transmit to us, and you use our Site and provide us with your information at your own risk.

## **9. What About Changes to the Privacy Policy?**

We reserve the right to change this Privacy Policy at any time. Any changes will be effective immediately upon the posting of the revised Privacy Policy and your use of the Web Site indicates your consent to the privacy policy posted at the time of use. However, we will not use your previously collected Personal Information in a manner materially different than represented at the time it was collected without your consent. To the extent any provision of this Privacy Policy is found by a competent tribunal to be invalid or unenforceable, such provision shall be severed to the extent necessary for the remainder to be valid and enforceable.