

Openfolio, LLC Privacy Policy

Overview

Welcome to Openfolio. The Openfolio Site and service are provided by Openfolio, LLC (“Openfolio,” “we,” “us” or “our”). Openfolio knows that you care how information about you is used and shared, and we appreciate your trust that we will do so carefully and sensibly. This notice describes our Privacy Policy for the www.openfolio.com website and the services made available by Openfolio through that website or through downloadable applications we make available to you (collectively, the “Site”). Capitalized terms used but not defined in this Privacy Policy shall have the meaning set forth in the Terms of Use. The Site provides access to a social platform that enables you to share, gather and curate investment ideas from a community of investors.

If you have questions or concerns regarding this Privacy Policy, you should contact us at yinon@openfolio.com.

This Privacy Policy covers only information that is collected through the Site and does not cover information that may be collected through software downloaded from the Site, websites to which we link.

Notice of Information We Collect And How We Use It

Our primary purpose in collecting Personal Information (as defined below) is to provide you with a safe, smooth, efficient, and customized experience. This allows us to provide Content, services and features that most likely meet your needs, and to customize our service to make your experience safer and easier. We only collect Personal Information about you that we consider necessary for achieving this purpose. "Personal Information" means information that specifically identifies an individual (such as a name, address, telephone number, mobile number or e-mail address) or other information about that individual that is directly linked to Personal Information. Personal Information does not include "aggregate" information, which is data we collect about the use of our Site and our services. Any information you do choose to share in your public profile can be accessed by all other users unless you select to share your profile only with a user group constituting people you approve.

During registration, you are required to give truthful contact information (such as name and email address) in accordance with our Terms of Use available during registration. Once you give us your Personal Information, you are no longer anonymous to us.

When you activate an account, we may collect information such as your name, email address, password, and security questions and answers.

Information We Collect About Site Visitors

We automatically track certain information based upon your use of the Site. We use this information to do internal research on our users' demographics, interests, and behavior to better understand, protect and serve you and our community.

By using our Site or our services, you indicate your consent for Openfolio and our affiliates to send cookies to your computer in order to uniquely identify your browser and improve the quality of our services; you may turn off cookies in your browser though, in doing so, some or all of our services may not work. For a description of how cookies work, please see the section entitled “Cookies” below.

Log Files

Like many Sites, we automatically gather certain information about our Site traffic and store it in log files. This information includes Internet protocol (IP) addresses, browser type, Internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and clickstream data. We use this information to analyze trends, to administer the Site, to track users' movements around the Site and to gather demographic information about our user base.

We use a third-party tracking service that uses log files and cookies, see below, to track non- Personal Information about visitors to the Site in the aggregate. This service captures usage and volume statistics to provide us information about users' movement around the Site as well as to allow us to improve the Site Content and services.

Cookies

A cookie is a small text file that is stored on a user's computer for record-keeping purposes. We use cookies on this Site. This Privacy Policy covers the use of cookies by the Site only and does not cover the use of cookies by any advertisers.

We use both session ID and persistent cookies.

A session ID cookie expires when you close your browser. We use session cookies to make it easier for you to navigate our Site. We use cookies for managing your browser and mobile sessions for your convenience.

A persistent cookie remains on your hard drive for an extended period of time. You can remove persistent cookies by following directions provided in your Internet browser's "help" file.

We set a persistent cookie to store your password, so you do not have to enter it more than once. Persistent cookies also enable us to track and target the interests of our users to enhance the experience on our Site.

If you reject cookies, you may still use our Site, but your ability to use some areas of our Site, such as contests or surveys, may be limited.

Some of our business affiliates (e.g., advertisers) may use cookies on our Site. Additionally, we have no access to or control over these cookies used on third party Sites or links. See "Third Party Advertisers." The acceptance and storage of cookies can be managed through your browser's security settings.

Clear Gifs (Web Beacons/Web Bugs)

We may employ a software technology called clear gifs, also referred to as web beacons or web bugs, that help manage content on the Site by tracking what content is effective. Clear gifs are tiny graphics with a unique identifier, similar in function to cookies, and are used to track the online movements of Web users. In contrast to cookies, which are stored on a user's computer hard drive, clear gifs are embedded invisibly on Web pages and are about the size of the period at the end of this sentence. We do not tie the information gathered by clear gifs to our customers' Personal Information.

We use clear gifs in our HTML-based emails to let us know which emails recipients have opened. This allows us to gauge the effectiveness of certain communications and the effectiveness of our marketing campaigns. If you would like to opt-out of these emails, please see "Choice and Opt-out."

We may use Embedded Scripts, which are programming code that collects information about your interactions with the Site, such as the links you click on. The code is temporarily downloaded onto your computer or other device from our server [or a third party provider] and is deactivated or deleted when you disconnect from the Site. In addition, we may use a variety of other technologies that collect similar information for security and fraud detection purposes.

You have the option to provide demographic information (such as income level and preferred language of communication) to us; we encourage you to submit this information so we can provide you a more personalized experience on our Site.

Mobile Use

If you visit or use our Site on a mobile device or use our mobile application, we may collect information from your device, including device ID, your mobile carrier, and your physical (GPS) location. We may store and use that information for security purposes (for example, for user verification). We do not share your location information with third parties. Depending on your device, you may turn off location services by going to your device settings.

Once you have established your account on your mobile device or computer, we may collect information we receive from your mobile device or computer, such as your device's type, number and the serial number of its chip. We also collect all payment card and transaction information, as described under "Notice of Information We Collect And How We Use It" above.

You may be able to opt-in to receiving text messaging reminders. If you opt-in, you must provide us your telephone number, which we will store and use to send reminders to you. You may opt-out at any time by replying "stop" to one of the text messages received. Use of the Site on a mobile device may allow your mobile carrier or other access provider to view data that appears on the device as a result.

Information We Collect To Respond To Your Choices and Requests

Registration

In order to use this Site, you must first complete the registration form and create a user name and password. During registration you are required to give truthful contact information (such as name and email address) in accordance with our Terms of Use. We use this information to contact you about the services on our Site in which you have expressed interest.

Public Profile

If you choose to create a public profile on the Site, we may collect other users' comments about you in our feedback area.

Refer-A-Friend

If you choose to use our referral service (if available) to tell a friend about our Site, we will ask you for your friend's name and email address. We will automatically send your friend a one-time email inviting him or her to visit the Site. Openfolio may store this information for the sole purpose of sending this one-time email and tracking the success of our referral program.

Your friend may contact us at yinon@openfolio.com to request that we remove this information from our database.

Forums and Online Chat

If you choose to post messages in our forums or other public message areas, to use our online chat features, or to leave feedback for other users, we may collect the information you post. We retain this information as necessary to resolve disputes, provide customer support and troubleshoot problems as permitted by law.

If you send us personal correspondence, such as emails or letters, or if other users or third parties send us correspondence about your activities or postings on the Site, we may collect such information into a file specific to you. We reserve the right to terminate the accounts of visitors who use these services in a manner inconsistent with the Terms of Use.

Communication from Us or the Site

Special Offers and Updates

We may occasionally send you information on services, special deals, and promotions. You can sign up for these emails from us on our registration page or other parts of the Site.

Out of respect for your privacy, we present the option not to receive these types of communications. Please see the "Choice and Opt-out."

Newsletters

If you wish to subscribe to our newsletter(s), we may use your name and email address to send a newsletter to you. Out of respect for your privacy, we provide you a way to unsubscribe. Please see the "Choice and Opt-out" section.

Service-Related Announcements

We will send you strictly service-related announcements on rare occasions when it is necessary to do so. For instance, if our service is temporarily suspended for maintenance, we might send you an email.

Generally, you may not opt-out of these communications, which are not promotional in nature. If you do not wish to receive them, you have the option to deactivate your account.

Customer Service

Based upon the Personal Information you provide us, we will send you a welcoming email. We will communicate with you in response to your inquiries, to provide the services you request, and to manage your account. We will communicate with you by email, in accordance with your wishes. You may contact customer service at yinon@openfolio.com.

Profile

We may store information that we collect through cookies, log files, and/or clear gifs, and/or third party sources to create a "profile" of your preferences. We may tie your Personal Information, to information in the profile, in order to improve the content of the Site for you.

We may share your profile in aggregate form, with other third parties.

Enhancement of Profile Information

We may purchase marketing data from third parties and add it to our existing user database, to better target our advertising and to provide pertinent offers in which we think you would be interested. To enrich our profiles of individual customers, we tie this information to the Personal Information they have provided to us.

Conditions Under Which We Share Information

Personal Information

Except as discussed in this Privacy Policy, we do not share Personal Information with third parties.

Agents and Service Providers

We use other third parties, such as Yodlee, to connect to users' brokerage accounts. We do not store, share or disclose login credentials. We will share Personal Information with Yodlee only as necessary for the Yodlee to provide that service. For more information on how Yodlee uses your information, visit <http://www.yodlee.com/privacy-policy/>.

Legal Disclaimer

We reserve the right to disclose your Personal Information as required by law and when we believe that disclosure is necessary to protect our rights; to comply with a judicial proceeding, court order, or legal process served on us or the Site; or in connection with an actual or proposed corporate transaction or insolvency proceeding involving all or part of the business or asset to which the information pertains.

Choice and Opt-out

You have the opportunity to 'opt-out' – to choose not to have your information shared – in connection with your information appearing on your Profile. In that case, only those users you approve will see your full Profile, and all other users will see your name, which may be changed to a first name and last initial (your "Public Display Name"), a photograph attached to your profile, and a sentence describing your portfolio. By sharing less, you will see a limited feed of trends, trades, and ideas. You may also choose to be on the 'do not mail' or 'do not email' list.

We may also provide non-personally identified information or aggregated information that does not identify you, to other parties for marketing, advertising, or other uses.

If you no longer wish to receive our newsletter and promotional communications, if any, you may opt-out of receiving them by following the instructions included in each newsletter or communication or by emailing us at yinon@openfolio.com.

Links to Other Sites

The Site contains links to other Sites that are not owned or controlled by Openfolio. Please be aware that we are not responsible for the privacy policies of such other Sites.

We encourage you to be aware when you leave the Site and to read the privacy policies of each and every Site that collects Personal Information.

This Privacy Policy applies only to information collected by our Site.

Access to Personal Information

If your Personal Information changes, or if you no longer desire our service, you may update or deactivate it by making the change on our settings page or by emailing our Customer Support at yinon@openfolio.com.

Please keep in mind that whenever you voluntarily make your Personal Information or other private information available for viewing by third parties online – for example on blogs, discussion forums, or other community posting or social networking Sites – that information can be seen, collected and used by others besides us. We cannot be responsible for any unauthorized third-party use of such information.

Security

We follow generally accepted industry standards to protect the Personal Information submitted to us, both during transmission and once we receive it. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, while we strive to use commercially acceptable means to protect your Personal Information, we cannot guarantee its absolute security.

If you have any questions about security on our Site, you can email us at yinon@openfolio.com.

Children Under 13 and Teens (Persons 13 to 17 Years of Age)

Our Site is not directed to people under 13 years of age. If you become aware that your child has provided us with Personal Information without your consent, please contact us at yinon@openfolio.com. We do not knowingly collect Personal Information from children under 13. If we become aware that a child under 13 has provided us with Personal Information, we take steps to remove that information and terminate the applicable account.

Teens are required to provide the email address of a parent or guardian before submitting any Personal Information. A notification message is sent to the parent or guardian of all guests who identify themselves as being between 13 and 17 years of age, which discloses the information provided by the teen and allows the parent or guardian to be aware of and participate in the teen's online experience. We do not knowingly collect data from or maintain data about users who are children under the age of 13.

Terms of Use

Please also visit our Terms of Use section establishing the use, disclaimers, and limitations of liability governing the use of our Site.

Your Consent

By using the Site, you consent to the current version of our Privacy Policy.

Changes to our Privacy Policy

If we decide to change our Privacy Policy, we will post changes to this Privacy Policy and other places we deem appropriate so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it.

We reserve the right to modify this Privacy Policy at any time, and such change will apply with respect to information you provide or your activity on the Site after the change in policy, so please review it frequently. If we make changes that materially affect our uses or disclosures of Personal Information that

we have previously collected, we will contact you by email or by means of a notice on our home page to obtain your consent to have the changes to our Privacy Policy apply retroactively.

Contact Us

If you have any questions or suggestions regarding our Privacy Policy, please contact us at: yinon@openfolio.com.

Effective Date: July 1, 2013