

EWR, INC. Privacy Policy

Purpose and Scope

This Website is owned and operated by EWR, Inc., a Tennessee Corporation with its offices and principal place of business in Collierville, Tennessee. In this privacy policy, "EWR, Inc.," the "Company," "us", "we" or "our" refers to EWR, Inc. and its websites. This privacy policy ("Privacy Policy") outlines the information we collect from the Website (as defined below) and how we use, disclose and otherwise manage that information, as well as the choices you have concerning such information. PLEASE READ THIS PRIVACY POLICY CAREFULLY BEFORE USING THIS WEBSITE.

This Privacy Policy applies to the information collected on our Website. For purposes of this Privacy Policy, "Website" means the Websites of EWR, Inc. available to our users, participants, or to the general public and to any software application made available by us for use on a computer, tablet, mobile phone or other mobile device. By submitting your personal information to us through the Website, you consent to the collection and use of your personal information in accordance with this Privacy Policy.

Access to EWR, Inc.'s electronic trading platforms is limited to participants in the relevant markets who have entered into agreements with EWR, Inc. for such access, and any such participant is also governed by the terms of those agreements.

Your use of this Website and our services, and any dispute over privacy, is subject to this Privacy Policy and our Terms and Conditions/Site Disclaimer, available here and from our homepage, including any applicable limitations on damages and the resolution of disputes. Our Terms and Conditions are incorporated by reference into this Policy.

1. Changes to Privacy Statement

We reserve the right to change this Privacy Policy from time to time. Changes and modifications to this Privacy Policy will be effective immediately upon posting of the changes and modifications on the Website, except where prohibited by law. You are bound by any such revisions and should therefore periodically visit this page to review the current Privacy Policy. If at any time you choose not to accept the terms of this Privacy Policy, you should not use this Website.

2. Collection of Information

Information We Collect Directly From You: We collect personal information from you when you use our Website; the type of information that we collect from you depends on your particular interaction with our Website and services. We require you to register with our Website to access certain features; we may collect the following information from you during the registration process: your name, country of residence, address, phone number, job title, company, investor type, email address, and a password that you select.

If you choose to purchase a product or service through our Website, we also will collect your credit card information. Currently, we use a third party service provider to process credit card transactions on our behalf. The third party will collect from you contact information (such as your name, address, and e-mail) and financial information (such as credit card number and expiration date).

Information We Collect About You Automatically. We and our third party service providers, use cookies, web beacons, and other tracking technologies to collect information about you automatically as you use our

Website. Examples of this type of information include, but are not limited to, the dates and times of your use of this Website and the route by which you choose to access it, including your IP (Internet Protocol) address, your browser type, your operating system, or domain name, and your use of any hyperlinks or downloadable content available on this Website. We may combine this information with other information that we collect about you. For additional information about our use of these technologies, please see “Cookies and Other Tracking Technologies” below.

3. Use of Your Information

We primarily use your information to provide our services to you and to respond to your inquiries. We also may use your information as follows:

- To communicate with you, including to respond to your comments or requests for information, to request feedback on our products and services, and to notify you about changes to subscriptions, services and products.
- To help us understand our customers, to tailor and enhance our product and service offerings, anticipate and resolve problems with any products or services supplied to you, create products or services that may meet your needs, communicate with you about our products and services, provide access to restricted pages or contents of the Website.
- To comply with legal and/or regulatory requirements.
- To facilitate your purchases and to identify you when you log into your account on our Website.
- For marketing and advertising purposes. For example, where permitted by applicable law, we will send you emails about products and services that we believe would be of interest to you, including products and services offered by third parties. We do not, however, share your information with third parties for their own marketing purposes. We also will use the information that we collect to evaluate the success of our advertising campaigns.
- For Website development, research, analytics, assessing patterns of use, regulatory purposes, planning and assessing marketing initiatives by EWR, Inc.
- As required or permitted by law.

4. Cookies and Other Tracking Technologies

Cookies

This Website uses cookies. See our separate statement concerning cookies.

Web Beacons

EWR, Inc. employs a software technology that serves as a web tracking device to collect certain information about traffic to the Website. This device is classified as a "web beacon" which means that the scope of its collection is restricted to the Website traffic data. It is similar in function to cookies. The main difference between cookies and web beacons is that web beacons are invisible on the page and are much smaller, about the size of the period at the end of this sentence. A P3P-compliant JavaScript cookie is set and collected by the tracking device to allow for differentiation between visitors to the sites. This data is used for tracking and reporting aggregate usage patterns on the Website as well as to enable us to track email response rates (e.g., whether you opened/ or forwarded an email).

IP Addresses

We use your IP address to help diagnose problems with our server, and to administer the Website. We may also use your IP address to identify you when we feel it is necessary to enforce compliance with this Privacy Policy or the terms of use for services purchased through the Website, or to protect our services, Website, systems, information, employees, business partners, service providers, users, customers or others, and for other purposes as described in this Privacy Policy.

5. Disclosures and Onward Transfers

We share your information with the following persons/entities and in the following circumstances:

Third Party Service Providers: To enable us to more efficiently provide the products and services you have requested from us, EWR, Inc. may share your personal information with selected third parties that act on our behalf as our agents, suppliers, or providers, or these third parties may collect your personal information on EWR, Inc.'s behalf. You acknowledge that the collection, transfer, storage, and processing of your personal information may be undertaken by these selected third parties for the purpose for which the information was collected. Our service providers are given the information they need to perform their designated functions, and we do not authorize them to use or disclose your personal information for their own marketing purposes.

Transfer of Business Assets

As we continue to develop our business, we might acquire or buy other businesses or assets. In such transactions, customer information generally is one of the transferred business assets. Also, we may transfer any information we have about you as an asset to third parties in connection with a merger or sale (including transfers made as part of insolvency or bankruptcy proceedings) involving all or part of EWR, Inc., or as part of a corporate reorganization or stock sale or other change in corporate control, for the purposes of such third parties carrying on the business of EWR, Inc. in relation to the continued provision of our services to you as described in this Privacy Policy.

Disclosure for Other Lawful Purposes

We may provide your personal information in response to a search warrant or other legally valid inquiry or order, or to an investigative body in the case of a breach of an agreement or contravention of law, or as otherwise required by applicable law. We may also disclose personal information where appropriate for the establishment, exercise or defense of legal claims, or as otherwise permitted by law.

6. Your Choices

If you wish to stop receiving information concerning our services or products, please contact us by email at webinfo@ewrinc.com to notify us of your wishes.

7. Notice to Non-US Users

We may transfer, process, and store your personal information outside of your home country, including in the United States and Canada, which may not have the same level of data protection as your home country. For the avoidance of doubt, if you are resident in the EEA this may include the transfer of your personal information from within the EEA to a country outside of the EEA.

8. Accessing Your Personal Information

If you have submitted personal information through an EWR, Inc. Website and you would like to access, update, or correct inaccuracies in your personal information, or have your name removed from our databases, please contact EWR, Inc. via email at webinfo@ewrinc.com, or send a letter to our Privacy Compliance Officer, 81 Peyton Parkway, Suite 101, Collierville, TN 38017.

9. Security and Data Integrity

We have put in place certain safeguards to help prevent unauthorized access and maintain data security with respect to your personal information. Despite these protections, however, we cannot guarantee that your data will be 100% secure. You should take measures to protect your personal information.

10. Your Security Obligations

Your online access to certain of your personal information may be protected with a password you select. We will never ask you for your password in any unsolicited communication (such as letters, phone calls or email messages). You have an obligation to keep your user ID, password and personal information secure. As part of maintaining this obligation we recommend that you do the following:

- Keep your user ID and password confidential;
- Utilize a unique password and change it frequently;
- Make sure others are not watching you enter your user ID and/or password on your keyboard when using protected areas of the Website; and
- Do not leave your computer unattended while logged onto protected areas of the Website. After you finished accessing your information, exit the protected area.

11. Children

This Website is not intended for use by minors (persons under the age of 18 and, in those Canadian provinces where the age of majority is 19, persons under the age of 19). If you are a minor, do not use this Website. If parents believe their minor children have accessed this Website and provided their personal information, please contact us using the information provided in the "Accessing Your Personal Information" section of this Privacy Policy so that we may delete the information.

12. Other Sites

Our Website may contain links to other sites that EWR, Inc. does not own or operate. Also, links to our Website may be featured on third party websites on which we advertise. Except as provided herein, we will not provide any of your personal information to these third parties without your consent. We provide links to third party websites as a convenience to the user. These links are not intended as an endorsement of or referral to the linked websites. We recommend you read carefully the privacy statements, notices and terms of use of any linked websites. We do not have any control over such websites, and therefore we have no responsibility or liability for the manner in which the organizations that operate such linked websites may collect, use or disclose, secure and otherwise treat your personal information.

13. Complaints/Comments

EWR, Inc. takes your privacy concerns seriously. If you have any questions about this policy or if you believe that EWR, Inc. has not complied with this Privacy Policy with respect to your personal information, you may send a letter to our Privacy Compliance Officer at 81 Peyton Parkway, Suite 101, Collierville, TN 38017.

14. Your California Privacy Rights

Under California's "Shine the Light" law, California residents who provide personal information in obtaining products or services for personal, family or household use are entitled to request and obtain from us once a calendar year information about the customer information we shared, if any, with other businesses for their own direct marketing uses. If applicable, this information would include the categories of customer information and the names and addresses of those businesses with which we shared customer information for the immediately prior calendar year (e.g. requests made in 2015 will receive information regarding 2014 sharing activities).

To obtain this information, please send an email message to webinfo@ewrinc.com with "Request for California Privacy Information" on the subject line and in the body of your message. We will provide the requested information to you at your e-mail address in response.

Please be aware that not all information sharing is covered by the "Shine the Light" requirements and only information on covered sharing will be included in our response.