

# PRIVACY POLICY

We at Octave Holdings and Investments, Inc. (collectively “Octave” or “we,” “us,” or “our”), have created this Privacy Policy to explain how we collect, use and share information we obtain through our websites located at [www.octavehi.com](http://www.octavehi.com), [www.plnms.com](http://www.plnms.com), [add other sites] (collectively, the “Sites”), as well as services that we offer through the Internet (together, the “Internet Services”). Except as described in Sections 3 and 5, this Privacy Policy does not govern our use of any information you communicate with us in any manner other than through the Internet Services, including but not limited to information you provide to us when you call us or write to us. Because the Internet is global, information about you that we collect or that you submit may be transferred to, processed in, and held in countries (including the United States) other than the one in which you reside.

By using the Internet Services, you explicitly consent to such use of your information and agree to the terms of this Privacy Policy. This Privacy Policy was updated as of September 1, 2019, and as described below, may be updated from time to time.

1. Information you choose to submit

To obtain access to the Sites and to receive certain Internet Services, you may be required to login and provide certain personal data and information about yourself (for example, your username, name and password) (“Personal Data”). We use Personal Data to fulfill your requests for Internet Services, as well as other products and services (together, the “Services”), to monitor and improve our Services, and to contact you from time to time about us and the Services.

2. Information we automatically collect, including through use of cookies

We automatically collect certain information to help us understand how you use the Internet Services (which we will refer to in this Privacy Policy collectively as “Usage Data”). For example, each time you visit the Sites we may automatically collect your IP address, browser and computer type, access time, the web page from which you came, and the web page(s) that you access during your visit. We may combine Usage Data with Personal Data in a manner that enables us to trace Usage Data to an individual user.

We may also use cookies (which are small amounts of data sent from a web server to your browser that are stored on your computer’s hard drive) to keep track of your use of the Internet Services, to validate your identity, to remember your password and preferences, to tailor the Internet Services to your account and to meet your interests, and to improve the quality of the Internet Services. Generally, you can set your browser not to accept cookies or to notify you if you are sent a cookie, giving you the opportunity to choose whether or not to accept the cookie. Please note that if you do set your browser not to accept cookies, certain Internet Services may

not function properly. Some web browsers may have “do not track” settings. The Sites do not honor “do not track” settings. We do not knowingly collect information from minors nor do we target the Sites to minors.

### 3. Our information sharing practices

Generally: Except as otherwise described in this section and in Section 5 of our Privacy Policy, we will not share your Personal Data or Usage Data (which we will refer to in this Privacy Policy collectively as “User Information”) with any third party without your permission.

Third-Party Service Providers: We employ other companies and individuals to perform functions on our behalf, such as for analyzing data and providing certain Internet Services. These third-party service providers have access to personal information needed to perform their functions, but we require that they not use personal information for other purposes. Personal Data is not shared with any unaffiliated third-parties for their marketing purposes.

Other Disclosure Scenarios: Notwithstanding anything in this Privacy Policy to the contrary, we reserve the right, and you hereby expressly authorize us to, share any User Information:

1. In response to subpoenas, court orders, regulatory requests or legal process, or to establish, protect or exercise our legal rights and interests or defend against legal claims;
2. If we believe it is necessary in order to investigate, prevent or take action regarding inappropriate or illegal activities, fraud, or situations involving potential threats to the safety of any person or property;
3. If we believe it is necessary to investigate, prevent, or take action regarding abuse of the Sites’ infrastructure or the Internet in general (such as voluminous spamming, denial of service attacks, or attempts to compromise the security of information);
4. To our parent company, subsidiaries, joint ventures, or other companies under common control with us (in which case we will require such entities to honor this Privacy Policy);
5. As part of a corporate transaction with a successor or affiliate or in connection with any acquisition, merger or sale of assets; or
6. With third parties who provide services to us; provided, however, that in those circumstances we request that our service providers not share your User Information in a manner inconsistent with this Privacy Policy.

### 4. Modifying and deleting your Personal Data

We have controls in place designed to ensure that the information we have is relevant, accurate, and appropriate for the purposes used. If you believe that any data about you is inaccurate,

please let us know by contacting [info@wealthrise.net](mailto:info@wealthrise.net). Please note that any Personal Data that we have copied may remain in back-up storage for some period of time after your request, and that if you delete certain information you may not be able to use our services in the future without re-submitting such information. Also, please note that we will maintain Personal Data in our database whenever we are required to do so by law or regulation. Under California Civil Law, Californians are entitled to request information relating to whether a business has disclosed Personal Data to any third parties for the third parties' direct marketing purposes. Californians who wish to request further information about our compliance with this statute or who have questions, more generally, about our Privacy Policy and our privacy commitments and our Sites should contact us at [info@wealthrise.net](mailto:info@wealthrise.net) or at [legal@wealthrise.net](mailto:legal@wealthrise.net).

#### 5. Security

We have implemented reasonable measures to help protect your User Information from loss, misuse or unauthorized access or disclosure. Unfortunately, however, no data transmission over the Internet can be guaranteed to be 100% secure. As a result, while we strive to protect your User Information, we cannot guarantee its security.

#### 6. Links

The Sites may contain links to other websites. We are not responsible for the privacy practices of any such other website (whether accessed through an advertisement, service or content link) and urge you to review such practices prior to submitting any information to such websites.

#### 7. Changes

We may update this Privacy Policy from time to time. If under any such update we make any material change to the way in which we treat your User Information, we will inform you of such change via e-mail or by posting a notice on relevant areas of the Sites. Any updated version of this Privacy Policy will be effective as of the date set forth therein. By continuing to use Internet Services, you expressly agree to the terms of the Privacy Policy.

#### 8. International Data Transfers

In order to use and disclose your Personal Data for the purposes described above, such Personal Data will be transferred internationally, including from the European Economic Area to the U.S. and other countries which the European Union has deemed do not provide "adequate" protection for personal information. We will ensure application of the same standards of privacy protection as set out in this Privacy Policy regardless of the international transfer or processing of Personal Data. By providing us your Personal Data and using any website, you consent to such

international transfers of Personal Data, as we deem appropriate, including transfers from the European Economic Area to the U.S. and other countries, which the European Union has deemed not to provide “adequate” protections for personal data.

9. Questions

If you have any questions about this Privacy Policy, please feel free to contact us by e-mail at [legal@octavehi.com](mailto:legal@octavehi.com)