

# Privacy Policy

*Effective July 15, 2021*

Viscogliosi Brothers Co-Investor Network, LLC and its Affiliates (“we” or “VBIN”) owns and hosts a full-service online platform (“Platform” or “the Platform”) through which VBIN and its affiliates including VB Asset Management, LLC and Viscogliosi & Company, LLC, connect Platform subscribers with various investment opportunities. The following privacy policy (the “Privacy Policy”) sets forth the way in which we handle information learned about you. This Privacy Policy applies to any online location that links to this Privacy Policy, including the following websites:

- [www.vbcoinvestornetwork.com](http://www.vbcoinvestornetwork.com)

As you (or the organization for which you are acting) access the Platform and its associated and/or affiliated services (collectively, “Services”), we collect certain personal information. We understand that the confidentiality and security of this information is important, and we are committed to protecting the privacy of your personal information. This Privacy Policy is intended to summarize our data protection practices and to advise our registered users, investors, issuers, employees, website visitors, and other third parties about our privacy policies that may be applicable to them. It is specifically addressed to those who provide personal information to VBIN and its associated and/or affiliated Services, or who visit or use our website, Platform, and social media sites.

Please note, the VBIN website, investment platform, and email communications are intended for use by persons aged eighteen (18) and older. If you believe that a minor has opened an account on our platform, made an investment, and/or disclosed personal information, please report this to us immediately by emailing us at [info@vbcoinvestornetwork.com](mailto:info@vbcoinvestornetwork.com).

By using the Platform, you agree to the terms and conditions of the User Agreement, including this Privacy Policy, and you consent to our privacy practices. We encourage you to read this Privacy Policy carefully.

## **What does VBIN do with your personal information?**

Financial companies choose how they collect, process, and potentially share your personal information. Consumers may limit some, but not all, sharing. Please read this notice carefully to understand how we collect, process, share, and protect your personal information.

We may use your personal information for the following purposes:

- To facilitate investments as directed by you if you are or become a customer and/or to respond to requests or inquiries you may have;
- To pursue legitimate interests, including to carry out, monitor, and analyze our business or operations;
- To contact you regarding features and functionality that may be of interest to you;
- To enter into or carry out contracts of various kinds;
- To conduct monitoring by us or any other person on our behalf using various methods, including: (i) the use of automated monitoring tools; (ii) through random monitoring of

systems; (iii) specific monitoring of systems for example in relation to investigations, regulatory requests, subject access requests, litigation, arbitration, or mediation; (iv) data tracking, aggregation and analysis tools that pull data to draw linkages and/or detect behavioral patterns, interactions or preferences for analysis (including predictive analysis); and/or (v) using other similar monitoring technology that may become available from time to time;

- To comply with applicable laws or regulations in any country; or
- For any other purpose for which your personal information was provided to us.

We may process your personal information for the following purposes after obtaining your express consent where legally required:

- To communicate with you through the channels you have approved to keep you up to date on the latest developments, announcements and other information about our Services, products and technologies;
- To conduct customer surveys, marketing campaigns, market analysis, or promotional activities;
- To collect information about your preferences to create a user profile to personalize and foster the quality of our communication and interaction with you.

With regard to marketing-related communication, we will - where legally required - only provide you with such information after you have opted in. We also provide you with the opportunity to opt out at any time if you do not wish to receive further marketing-related communication from us.

Depending on the above permitted purposes, we may process your personal information on one or more of the following legal grounds:

- Because processing is necessary for the execution of a client instruction or other contract with you;
- To comply with our regulatory recordkeeping obligations; or
- Because processing is necessary for the purposes of our legitimate interest or those of any third-party recipients that receive your personal information, provided that such interests are not overridden by your interests or fundamental rights.

In addition, the processing may be based on your consent where you have expressly given that to us.

**The types of personal information we collect and share depends on to what extent you use our Platform. This can include information:**

- Provided during the user registration or investment process, for example, your name, email address, telephone number, birth date, tax or other identification number, investment objectives, etc.;
- Received from consumer-reporting agencies; and
- Collected through internet cookies.

As a general principle, you will provide us with your personal information entirely voluntarily. There are circumstances in which we cannot take action without certain of your personal

information, for example, because it is required to process your instructions or provide you with access to our Services. In these cases, it will be impossible for us to act on your request without the relevant personal information, and we will notify you accordingly.

If you provide personal information to us about someone else (such as an account co-owner or authorized individual), you must ensure that you are entitled to disclose that personal information to us and that, without our taking any further steps, we may collect, use and disclose that personal information as described in this privacy policy. In particular, you must ensure that the individual concerned is aware of the various matters detailed in this Privacy Policy, as those matters relate to that individual, including our identity, how to contact us, our purposes of collection, our personal information disclosure practices, any right the individual may have to obtain access to the personal information, make complaints about the handling of the personal information, and the consequences if the personal information is not provided (such as our inability to provide services).

**All financial companies need to share customers' personal information to run their everyday business. In the sections below, we list the reasons financial companies can share their customers' personal information and whether you can limit this sharing.**

We may share your personal information in the following circumstances:

- We may share your personal information between VBIN affiliates on a confidential basis as allowed by applicable law, to offer our products and services to you for marketing purposes, for our affiliates to market their products and services to you, where required for the purpose of providing products or services, and for administrative, billing and other business purposes;
- We may instruct service providers within or outside of VBIN to process personal information on our behalf and in accordance with our instructions. VBIN generally either requires these service providers to enter into confidentiality agreements that limit their use of the information they receive or utilizes software as a service (SaaS) providers with whom confidentiality is delineated and verifiable. Such limitations prohibit the service provider from using VBIN customer information other than to carry out the purposes for which the information was disclosed.
- We may share your personal information with companies providing services in the areas of fraud and crime prevention and with companies providing similar services, including financial institutions such as credit reference agencies and regulatory bodies;
- Consistent with applicable law, we may share your personal information with courts, law enforcement authorities, regulators or attorneys or other parties for the establishment, exercise or defense of a legal or equitable claim or for the purposes of a confidential alternative dispute resolution process;
- We may also use aggregated personal information and statistics for the purpose of monitoring website usage in order to help us develop our website and our Services.

Otherwise, we will only disclose your personal information when you direct us or give us permission to do so, when we are allowed or required by applicable law or regulations or judicial or official request to do so, or as required to investigate actual or suspected fraudulent or criminal activities.

## **To limit our sharing, or for any other questions**

- Call us at (888)-698-2426
- Email us [info@vbcoinvestornetwork.com](mailto:info@vbcoinvestornetwork.com) at
- Visit us online at [vbcoinvestornetwork.com](http://vbcoinvestornetwork.com)

**Who is providing this notice?** VBIN and its affiliated companies.

## **How does VBIN retain and protect my personal information?**

We retain your personal information in an identifiable form in accordance with our internal policies which establish general standards and procedures regarding the retention, handling and disposition of your information. Personal information is retained for as long as necessary to meet legal, regulatory, and business requirements. Retention periods may be extended if we are required to preserve your personal information in connection with litigation, investigations, or proceedings.

To protect your personal information from unauthorized access and use, we will take appropriate technical and organizational measures to keep your information confidential and secure in accordance with our internal procedures regarding the storage, disclosure of, access to, and eventual disposal of, personal information. Personal information may be kept on our information technology systems as well as those of certain third-party firms with whom we contract to facilitate normal business operations.

## **How does VBIN collect my personal information?**

**We collect your personal information, for example, when you:**

- Browse our website;
- Register for VBIN Services and apply for an account; and
- Interact with VBIN online, via email, or telephone.

## **Why can't I limit all sharing?**

U.S. law gives you the right to limit only:

- Sharing for affiliates' everyday business purposes—information about your creditworthiness;
- Affiliates from using your information to market to you; and
- Sharing for non-affiliates to market to you.

State laws and laws or regulations applicable to the country in which you live may give you additional rights to limit sharing.

## **What happens when I limit sharing for an account I hold jointly with someone else?**

Your choices will apply to everyone on your account.

### **Definitions**

Affiliates: Companies related by common ownership or control. They can be financial and non-financial companies. Affiliates of VBIN include VB Asset Management, LLC and Viscogliosi & Company and Viscogliosi Brothers, LLC and its portfolio companies.

Non-affiliates: Companies not related by common ownership or control. They can be financial and non-financial companies. Nonaffiliates we share with can include participating issuers, service providers (data processors), and governmental or regulatory agencies as required by law.

### **State Specific Privacy Laws**

- CA and VT Residents: We will not share your information with non-affiliated companies, except for our everyday business purposes, for marketing our products and Services to you, or with your consent.
- VT Residents only: We will not disclose credit information about you either internally or with non-affiliated companies except as required or permitted by law.
- NV Residents: Notice provided pursuant to state law. To be placed on our internal Do Not Call List, call 800.283.9903. For more on this Nevada law, contact Bureau of Consumer Protection, Office of the Nevada Attorney General, 555 E. Washington St., Suite 3900, Las Vegas, NV 89101; Phone number: 1-702-486-3132; e-mail: BCPINFO@ag.state.nv.us.

### **European Economic Area & the General Data Protection Regulation (“EEA” & “GDPR”)**

If you are an individual located in the EEA, you have a number of legal rights under GDPR in relation to the personal information that we hold about you. These rights include:

- Obtaining information regarding the processing of your personal information and access to the personal information that we hold about you. Please note that there may be circumstances in which we are entitled to refuse requests for access to copies of personal information. In particular, information that is subject to legal professional privilege;
- Requesting that we correct your personal information if it is inaccurate or incomplete;
- Requesting that we erase your personal information in certain circumstances. Please note that there may be circumstances in which you ask us to erase your personal information, but we are legally entitled or required to retain it;
- Objecting to, and requesting that we restrict, our processing of your personal information in certain circumstances. Again, there may be circumstances where you object to, or ask us to restrict, our processing of your personal information, but we are legally entitled to refuse that request;

- Withdrawing your consent, although in certain circumstances it may be lawful for us to continue processing without your consent if we have another legitimate reason (other than consent) for doing so.

If you wish to do any of the above, please:

- Call us at 1 (888) 698-2426
- Email us at [info@vbcoinvestornetwork.com](mailto:info@vbcoinvestornetwork.com)
- Visit us online at [vbcoinvestornetwork.com](http://vbcoinvestornetwork.com)

We may request that you prove your identity by providing us with a copy of a valid means of identification in order for us to comply with our security obligations and to prevent unauthorized disclosure of data. We reserve the right to charge you a reasonable administrative fee for any manifestly unfounded or excessive requests concerning your access to your data and for any additional copies of the personal information you request from us.

We will consider any requests or complaints that we receive and provide you with a response in a timely manner. If you are not satisfied with our response, you may take your complaint to the relevant privacy regulator. We will provide you with details of your relevant regulator upon request.

## **Cookies and Web Beacons**

Your browser must be set to accept cookies in order to access VBIN as a registered user. Please see our Cookie Policy for additional information concerning our policies concerning cookies and other related technologies.

## **Accessing, Reviewing and Changing Your Personal Information**

We urge you to review your information regularly to ensure that it is correct and complete. As a registered user, you can review and change your personal information via [vbcoinvestornetwork.com](http://vbcoinvestornetwork.com). You may not be able to change some account information online. If you are unable to make your desired changes, please contact us for assistance. Although we will require you to revalidate your personal information periodically, you should promptly update your personal information if it changes or becomes inaccurate.

We retain certain information after account closure to comply with law, prevent fraud, assist with investigations, resolve disputes, analyze or troubleshoot programs, enforce our User Agreement, and take actions otherwise permitted by law. If your account or membership is terminated or suspended, we may retain some information to prevent re-registration.

We will not be responsible for any losses, material or otherwise, arising from any unauthorized, inaccurate, inauthentic, deficient or incomplete personal information that you provide to us.