

VESEL, LLC PRIVACY POLICY

Vesel Data Portal

Last Updated: January 25, 2017

Vesel, LLC respects the privacy of our subscribers. We have developed this privacy policy to explain how we collect and use information through our Vesel service (the "Service") and on the website located at www.veselinteractive.com.

HOW WE COLLECT INFORMATION

- **Registration Data-** Our registration process requires you and/or your employer to provide professional contact information, such as your full name, company, title, e-mail address, office address and phone number. We will also receive your payment information, such as a credit card number and expiration date. You must provide this information in order for us to register you as a subscriber of Vesel.
- **Information You Choose to Share-** We receive all information that you voluntarily share with Vesel (if any), including, without limitation, your professional profile, trade information, comments, photos, messages, postings, videos and contacts. We also record information regarding our interactions with you and our marketing and support staffs as well as your interactions with the Service.
- **Information Others Share About You-** We may receive information about you from your company and from subscribers with whom you have shared messages, postings and videos. We may also obtain information about you from referrals and from directories, websites and other publicly available sources.
- **Information Automatically Collected-** As is true of most websites, we gather certain information automatically and store it in log files. This information includes, without limitation, Internet Protocol addresses, browser type, Internet service provider (ISP), referring/exit pages, operating system, date/time stamp and clickstream data.
 - Cookies are small text files stored on your computer by a website that assigns a numerical user ID and stores certain information about your online browsing. We use cookies on this site to help us recognize you as a prior user. No personally identifiable information is stored on any cookie that we use.
 - If you wish, you can adjust your web browser's privacy settings to delete cookies upon exiting websites or when you close your browser. You may also configure your browser to block cookies, however doing so may negatively impact your user experience on this site.

HOW WE USE YOUR INFORMATION

- We primarily use the information we collect to administer and provide the Service to you and our other subscribers, including, without limitation, to provide you support and training, respond to your inquiries, and to alert you regarding product updates and downtime.

- We may also use your personal information to communicate with you about events, products and services that may be of interest to you and, as necessary, to notify you regarding security, privacy and administrative issues.
- Lastly, we use the information we collect to conduct research and perform analyses in order to measure, maintain, protect, develop and improve our website, products and services and to otherwise manage our business.

HOW WE SHARE YOUR INFORMATION

- We share your information with agents, contractors or partners of Vesel in connection with services that these individuals or entities perform for, or with, Vesel in connection with the Service. These agents, contractors or partners are restricted from using this information in any way other than to provide the required services for Vesel. We may, for example, provide personal information to agents, contractors or partners for hosting our Service, for data processing services, or for sending you information that you requested, but those parties cannot use your personal information for their own purposes unrelated to the work they are doing for us. We may use your de-identified demographic information in order to serve third-party advertising on the Service; however, we will not sell or otherwise transfer your personal information to third parties for promotional or direct marketing purposes.
- We may share your personal data and any content you submit to the Service with your supervisors and your company's human resources personnel and compliance officers.
- We may transfer your information in connection with the sale, assignment, or other transfer of the business of the Service, in which case we will make commercially reasonable efforts to ensure that any such buyer agrees to treat personal information in accordance with this Privacy Policy.
- We may also disclose your information to governmental authorities as required to respond to duly authorized information requests of governmental authorities or where required by law, to protect the safety of an individual, to protect Vesel's rights and/or property, and to investigate suspected fraudulent activity in connection with the Service or violation of another party's rights.

DISCLOSURES IN PUBLIC FORUMS

- You should be aware that content that you voluntarily include and transmit in a publicly accessible area of the Service may be viewed and used by others. For instance, whenever you contribute to the Service, your user name and a link to your profile may automatically appear with your post.
- Once your information is shared with third parties, we are unable to control, and you assume the risk regarding, how such information may be viewed and used.

INFORMATION FROM CHILDREN

We have no intention of collecting personal information from children under the age of 13. If we become aware that personal information from a child under 13 has been collected without the verifiable consent of such child's parent or guardian, we will use all reasonable efforts to delete such information from our database.

SECURITY

The security of your personal information is very important to us. We have put in place reasonable physical, electronic, and managerial procedures to safeguard the information we collect (that is not otherwise intended to be publicly assessable on the Service). Only those employees who need access to your information in order to perform their duties are authorized to have access to your personal information. However, we cannot guarantee that all communications between us or information stored on our servers will be free from unauthorized access by third parties such as hackers, and your use of the Service demonstrates your assumption of this risk.

THIRD PARTY WEBSITES

As a convenience to our visitors, the Service may contain links to a number of websites that we believe may offer useful information or services. The policies and procedures we described here do not apply to those websites. We suggest contacting those websites directly for information on their privacy, security, data collection, and distribution policies.

MODIFYING YOUR PERSONAL INFORMATION

If you would like to modify or amend from our database any personal information stored in your profile, or if you would like to amend your profile completely, you can do so by logging into the Service, visiting the “My Account” section, and viewing the options available to you. Within this section, you can edit your information or cancel your subscription. We will endeavor to implement your changes within ten (10) calendar days.

Please note that any personal information that we collect may remain in back-up storage for some period of time after your request. We will also be unable to recover any personal information from any third party once it has been disclosed or transferred to them. Also, please note that we will maintain all usage data and personal information in our database whenever we are required to do so by law. You will not be able to delete the content you post in messages or community discussions.

TRANSBORDER POLICY AND ENFORCEMENT

Vesel is a global Service. Your personal information and other content may be collected, stored, processed, used and transferred by one or more Vesel affiliated companies or non-affiliated service providers in one or more countries outside your originating country.

By using this website and the Service, you consent to the transfer, storage, use and disclosure of your Personal Information among our affiliated companies and non-affiliated service providers, wherever located. Vesel’s service providers are contractually bound to respect the confidentiality of your Personal Information.

Vesel is committed to working with individuals to obtain a fair resolution to any complaints or disputes about privacy and Personal Information. Please contact us if you have any questions or concerns regarding this privacy policy or our practices. Any questions, complaints or concerns about this Privacy Policy should be sent to privacy@veselinteractive.com or via regular mail, postage prepaid, addressed to:

Privacy Officer
Vesel, LLC
PO Box 208
Dolgeville, NY 13329

CHANGES TO THIS POLICY

We reserve the right, at our discretion, to modify our privacy practices and update and make changes to this Privacy Policy at any time. As we modify this site to accommodate changes in our business model, developments in the securities industry and take advantage of technological advances, the practices described in this Privacy Policy will change. For this reason, we encourage you to refer to this Privacy Policy on an ongoing basis. This Privacy Policy is current as of the “Last Revised” date which appears at the top of this page. We will treat personal information in a manner consistent with the Privacy Policy under which it was collected, unless we have your consent to treat it differently. By using this website following any Privacy Policy change, you freely and specifically give us your consent to collect, use, transfer and disclose your personal information in the manner specified in such then-current Privacy Policy.

CONTACT US

If you have any questions regarding this Privacy Policy, please email us at support@veselinteractive.com or write to us at the following address:

Vesel, LLC
PO Box 208
Dolgeville, NY 13329