

# **Chilton Digital Privacy and Cookies Policy**

*Date of most recent update: December 19, 2019*

## **Introduction and scope of policy**

This Chilton Digital Privacy and Cookies Policy (“*Policy*”) applies to your interaction with Chilton Capital Management LLC or any of its subsidiaries (collectively, “*Chilton*,” “*we*,” “*us*,” “*our*”), at any online or mobile site or application that we own and control (“*Site*”), unless a different online and/or mobile policy is posted at a particular site, or is made available to you and by its terms supplants this Policy. Other privacy policies may also apply in addition to the terms of this Policy. As examples, certain additional Chilton privacy-related policies and notices are posted on the [Privacy Policy Index](#). You may also receive an additional privacy notice in connection with your use of a particular product or relationship with a specific business. For example, Trust or fiduciary accounts for which Chilton is the trustee or service provider, including employer-sponsored retirement accounts, are protected under special rules of confidentiality. Information on these accounts is not shared for marketing purposes without specific consent. This Policy also explains certain data use and data protection functionalities and practices of our online ads, such as banner ads, on third party sites. Please note that where we have another type of presence on a site owned by a third party, such as a page or handle on a social media site, that third party’s privacy policy and terms of use, rather than this Policy, will govern, unless specifically stated otherwise.

## **Agreement to policy**

By using a Site or interacting with a Chilton advertisement or page or account on a third party site, you consent to this Policy, including your consent to our use and disclosure of information about you in the manner described in this Policy.

## **How do we use Cookies and similar Technology?**

We, our associated firms and/or other persons acting on our or their behalf use cookies and similar technology to collect, use and share information when you visit our Sites or interact with us on-line *e.g.* via email or other electronic means.

Cookies are small, usually randomly encoded, text files that help your browser navigate through our Sites. The cookie file is generated by our website when you access it and is accepted and processed by your computer's browser software or when you interact with us on-line. The cookie file is stored in your browser's folder or subfolder.

Cookies and similar technology enable Chilton to capture and compile statistical information about how you use our Sites and interact with us on-line, including information relating to the frequency of visits, IP addresses, readership data, (such as the average length of visits, which pages are viewed or shared during a visit or other interactions with our content such as time spent viewing videos, PDFs read and links clicked), authentication information, acceptance or rejection of website terms, periods of inactivity, time zones, language preferences and other regional information.

We, our associated firms and/or other persons acting on our or their behalf use this information for the following purposes:

- To assess the effectiveness of advertising and readership content;
- To improve the website content and performance;
- To estimate our audience size and usage pattern;
- To speed up your searches;
- To enable log in and authentication when you log onto our sites;
- To recognize you when you return to our sites;
- To deliver a better and more personalized service by allowing us to customize our site according to your individual interests; and
- To deliver marketing communications that may be of interest to you, including ads or offers tailored to you.

Information held in cookies or similar tracking technology set by Chilton are kept to a minimum and can only be read by Chilton, our associate firms, their authorized third parties or by someone who has physical access to your personal computer.

### **How can you manage your Cookie preferences?**

Many web browsers allow you to control the use of most cookies through their browser settings. To learn more about cookies, including information on what cookies have been set on your computer and how cookies can be managed and deleted, visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

Some of our Sites use Google Analytics to track your activity. To opt out of being tracked by Google Analytics across all websites visit: [please click](#).

Some of our Sites use Adobe Analytics to track your activity. To opt out of being tracked by Adobe Analytics across all websites visit: [please click](#).

Most browsers are initially set to accept cookies. However, you have the ability to disable cookies if you wish, generally through changing your internet software browsing settings. It may also be possible to configure your browser settings to enable acceptance of specific cookies or to notify you each time a new cookie is about to be stored on your computer enabling you to decide whether to accept or reject the cookie. To manage your use of cookies there are various resources available to you, for example the “Help” section on your browser may assist you. You can also disable or delete the stored data used by technology similar to cookies, such as Local Shared Objects or Flash cookies, by managing your browser’s “add-on settings” or visiting the website of its manufacturer. As our cookies allow you to access some of our website’s features we recommend that you leave cookies enabled. Otherwise, if cookies are disabled, it may mean that you experience reduced functionality or will be prevented from using the site altogether.

Unless you have adjusted your browser setting so that it will reject cookies, our system will issue cookies when you access or use our Sites or online services. By accessing or using our Sites or

online services you consent to Chilton using cookies. In the event you refuse to accept cookies by adjusting your browser setting, some or all areas of our Sites or online services may not function properly or may not be accessible.

## **Gathering, using, and sharing information**

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### **Types of information**

You may interact with us in a variety of ways online, including through a mobile device. We may offer sites or applications that permit browsing and do not require registration. We may also offer the ability to enroll, register or access your accounts online. Information that we may collect about you through online interaction includes information that you input, such as your name, address, email address, other contact information; data resulting from your activity, such as transaction information; and location information. We may also gather additional information, such as the type of device and browser you are using, the IP address of your device, information about your device’s operating system, and additional information associated with your device. We may also gather information collected through cookies, tags, and other technologies, as described further below.

### **About “cookies” and Ad Choices on third party sites**

Cookies are pieces of data stored on your device. Browser cookies are assigned by a web server to the browser on your device. When you return to a site you have visited before, your browser gives this data back to the server. Mobile applications may also use cookies.

We use cookies and information gathered through their use to make your experience with Chilton and certain other sites richer and more personalized based on the products, services, or other interaction you have with us and other sites. Information gathered through use of cookies may be used to make offers to you via online ads, email, U.S. mail, or telephone, subject to the privacy preferences you have on file with Chilton. (Privacy preferences for employer-sponsor retirement accounts default to no marketing, solicitation or sharing for marketing purposes without specific consent.) We also use cookies, sometimes in conjunction with service providers, in online advertising either on our own Site or on third party sites to help determine which of our advertisements are most likely to appeal to you. We respect consumers’ ability to exercise choice in receiving these types of ads on third party sites. We honor your choice as follows: For this type of advertising placed on third party sites, we participate in the program utilizing the Advertising Options Icon. If you receive an ad delivered on a third party site in part based on information gathered through the use of cookies, you may opt out of receiving such ads by clicking the displayed icon and following the instructions or by visiting <http://www.aboutads.info/choices/>. This opt-out works via cookies, so if you delete cookies, use a different device, or change web browsers, you will need to opt out again. Please note that we respect your choice via participation in the Advertising Options Icon/aboutads.info program. Information that we collect about you from one particular browser or device may be used to provide advertising or collect information on another browser or device. It may also be transferred to a third party for advertising or

information collection on behalf of Chilton. Please note that your choice to opt out on a particular browser or device will apply only to the collection and use of information from that particular browser or device. Opting out on a particular device will not opt you out of information collection on other devices, nor will it limit cross device sharing on those other devices. Industry standards are currently evolving and we may not separately respond to or take any action with respect to a “do not track” configuration set in your internet browser.

Other parties that may collect information about your web browsing behavior when you use our Site are generally limited to service providers who may only use any information collected to provide services and marketing for us and not to provide services or advertising for any other party. Note, however, that we also provide certain widgets or tools on our sites, such as tools that allow web surfers to easily share information on another platform, such as a social media platform. At other times, information from a third party may be embedded on our site, such as a map or information streaming from another site, including communications streaming from a third party social media platform. These widgets, tools, and informational items often function through the use of third party cookies utilized by the third party site, such as the social media platform. As a result, these third parties may have access to information about your web browsing on the pages of our Site where these widgets, tools, or information are placed. You may wish to review information at third party sites, such as social media platforms where you have an account, to determine how these third parties treat data that they obtain through the use of cookies.

We also use cookies for purposes such as maintaining continuity during an online session; gathering data about the use of our site; monitoring online promotions; and anti-fraud and information security purposes.

### **Do you have to accept cookies?**

You may be able to set your browser to reject browser cookies. However, if you choose to reject cookies, you cannot access your accounts online with Chilton. Therefore, if you set your browser options to disallow cookies, you will limit the functionality we can provide when you visit our Site. The latest versions of internet browsers provide cookie management tools, such as the ability to delete or reject cookies. We recommend that you refer to information supplied by browser providers for more specific information, including how to use these tools.

### **Additional cookies**

Cookies is a term also used to describe other locally stored objects, such as cookies stored in an Adobe folder on your device. These cookies will not be deleted when you clear cookies from your browser. We may use this technology for purposes such as information security and fraud prevention. We do not use this technology for online behavioral advertising purposes. Please refer to information provided by Adobe for information on how to disable and control Flash objects. If you choose those options, you may limit the functionality we can provide when you visit our Site.

**Additional technologies.** We may also use additional technologies such as pixel tags, web beacons, and clear GIFs, and may permit our third party service providers to use these technologies. We use these technologies for purposes such as measuring the effectiveness of our advertisements or other communications, determining viewing and response rates, and determining which offers to present to you on our own or on third party sites.

**Using information.** In addition to the uses described above, we use information for purposes as allowed by law such as: servicing; communicating with you; improving our Site, products, or services; legal compliance; risk control; information security; anti-fraud purposes; marketing or personalizing the presentation of our products and services to you; tracking website usage, such as number of hits, pages visited, and the length of user sessions in order to evaluate the usefulness of our sites; and using read-receipt notifications in our email communications.

### **Sharing**

We may share information with service providers with whom we work, such as data processors and companies that help us market products and services to you. When permitted or required by law, we may share information with additional third parties for purposes including response to legal process. As applicable, please see the additional privacy policies referenced above, such as the Chilton U.S. Consumer Privacy Notice, for more information on how we may share information with affiliates and third parties.

### **Children's privacy**

From our web pages, we do not knowingly collect personal information from individuals under the age of 13 without obtaining verifiable consent from their parents. We request that such individuals do not provide personal information through the services.

For more information about the Children's Online Privacy Protection Act (COPPA), visit the FTC website: [www.ftc.gov](http://www.ftc.gov).

### **Policy updates and effective date**

If we make updates to this Policy, we will update the Policy with the changes and revise the "date of most recent update" posted at the top of this Policy. Any updates to the Policy become effective when we post the updates on the Site. Your use of the Site following the update to the Policy means that you accept the updated Policy.