

CataMetrics Management Privacy Policy

Website Privacy Policy

www.catametricsmanagement.com

This information has been compiled to better serve those who are concerned with how their “Personally Identifiable Information PPI” is being used online by CataMetrics Management (CM). PPI, as used in US privacy law and information security, is information that can be used on its own or with other information to identify, contact, or locate a single person, or to identify an individual in context. Please read our privacy policy to learn how we collect, use, handle and protect your Personally Identifiable Information.

What information do we collect?

When registering on our CM site, as appropriate, you may be asked to enter your name, email address or other contact information so that we may contact you in the future.

When do we collect information?

We collect information from you that you enter on our site.

How do we use your information?

We may use the information we collect from you at our site to contact you, sign you up for our newsletter, or provide other CM communications and marketing materials to you.

How do we protect visitor information?

We do not use vulnerability scanning and/or scanning to PCI standards. CM does not use and SSL certificate. We only provide articles and information and do not ask for private information from you.

Do we use cookies?

We do not use cookies for tracking purposes.

Third Party Disclosures

We do not sell, trade or otherwise transfer Personally Identifiable Information

Third Party Links

We do not include or offer third party products or services on our website.

Google

We have not enabled Google Adwords on our site.

COPPA (Children Online Privacy Protection Action)

We do not specifically market to children under 13.

Fair Information Practices

In order to be in line with Fair Information Practices, CM will take the following responsive action should a data breach occur:

We will notify users via the site notification within 7 business days.

We agree to the individual redress principle, which requires that individuals have a right to pursue legally enforceable rights against data collectors and processors who fail to adhere to the law. This principle requires not only that individual have enforceable rights again data users, but also that individuals have recourse to courts or a government agency to investigate and/or prosecute non-compliance by data processors.

Client Account information

Client information from Corporate Clients and Investment Advisers is discussed in the **CataMetrics Client Agreements** and pertains to information provided to CataMetrics for the construction of model portfolios.

CM does not maintain individual retail client accounts at this time. The following privacy policy pertains to any personal information held by the company:

CM does not disclose any confidential personal information about clients or former clients to anyone, except as permitted by law.

It is part of Firm policy to restrict access to confidential personal information to those employees who need to know that information to provide products or services to clients. We maintain physical, electronic, and procedural safeguards to comply with federal standards to guard confidential personal information.

The Firm will ensure that retail clients will receive this Privacy Policy is provided to new clients at the new account opening stage and that notice of its availability is also provided to the Firm's customer statements on an annual basis.

CM shares nonpublic information solely to service retail client accounts. We may disclose the following information regarding clients and/or former clients, as necessary,

to companies to perform certain services on our behalf or to other financial institutions, or as required by law.

- Information CM receives from clients on applications (name, social security number, address, assets, etc.)
- Information about client transactions with CM or others (account information, payment history, parties to transactions, etc.).

CM will internally safeguard all nonpublic personal information by restricting access to only those employees who provide products or services to clients or those who need access to client information to service accounts. CM maintains physical, electronic and procedural safeguards that meet federal and/or state standards to guard nonpublic personal information.

Contact Information

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