

# Website Privacy Policy

**January 2020**

Please read this Website Privacy Policy carefully before using this website to learn how the personal information provided by using this website is collected, used, and protected, and your choices for managing your personal information. Semper Capital Management, L.P. (“Semper” or the “Firm”) respects your privacy and appreciates the confidence you have placed in this website. The Firm is committed to protecting your privacy and preserving your trust. Semper reserves the right to modify this Website Privacy Policy without notice. Each use of the website constitutes your acceptance to be bound by the terms set forth in the Website Privacy Policy as modified.

## What Types Of Information Does The Firm Collect From Users of This Website?

Semper collects information that may personally identify you such as your name, address, telephone number, email address, employer name, or other data which can be reasonably linked to such information. This information is collected when you fill out forms on the website, register on the website, subscribe to one of our services, and at various other times. Semper may automatically collect non-personal information that does not identify an individual user such as internet protocol (IP) address, internet service provider information (ISP), user browser information, time website is visited, areas of the website visited and other anonymous website usage data.

The Firm may use cookies. Cookies are small files containing a string of characters that uniquely identifies your user browser. The Firm may use web beacons. Web Beacons are electronic files placed within a web website that monitors usage. Most web browsers are initially set up to accept cookies but you can reset your web browser to refuse all cookies or to indicate when a cookie is being sent. Certain features of the website may not work if you delete or disable cookies.

## How Does The Firm Use The Information Collected?

The Firm will not sell, share, or rent personal information to third parties. The Firm will not otherwise disclose personal information to third parties without your permission except as provided herein.

The Firm use personal information and non-personal information for internal purposes including:

- contacting and providing you with information regarding our products and services;
- servicing your account;
- enhancing your experience at the website;
- performing administration and technical support for the website;
- enabling you to use certain services and features available on or through the website; and
- creating aggregate information about demographics and usage patterns.

The Firm may use aggregate information to measure general website usage patterns and characteristics of our user base. If the Firm uses such data at all it will be on an aggregate basis and the Firm will not disclose to third parties any information that could be used to identify you personally.

The Firm also may share personal information with entities controlling, controlled by, or under common control with the Firm. In the event that the Firm is merged or in the event of a transfer of the website and related assets we may disclose or transfer your personal information and non-personal information in connection with such transaction to the surviving entity or the acquirer of the assets.

The Firm may use internal or external service providers to operate the website or perform work on our behalf including sending postal mail and email. Such persons may have access to your personal information you submit through the website but only for the purpose of performing their duties. The Firm requires each service provider to agree to implement and maintain reasonable security procedures and practices appropriate to the nature of your information in order to protect your personal information from unauthorized access, destruction, use, modification, or disclosure.

In certain instances, the Firm may disclose your personal information when we have reason to believe it is necessary to identify, contact or bring legal action against persons or entities that may be causing injury to you, the Firm or its affiliates, or to others. The Firm may also disclose your personal information when we believe the law or legal process requires such disclosure.

No data transmission over the Internet can be guaranteed to be fully and completely secure. While the Firm strives to protect personal information, the Firm cannot and do not guarantee or warrant the security of any information you transmit to or from the website, and you do so at your own risk.

The website may contain links to websites operated and maintained by third parties over which the Firm has no control. Privacy policies on such linked websites may be different from our Website Privacy Policy. You access such linked websites at your own risk. You should always read the privacy policy of a linked website before disclosing any personal information on such website.

The Firm does not knowingly collect personal information from children under the age of thirteen (13). If the Firm becomes aware that we have inadvertently received personal information from a child under the age of thirteen (13), the Firm will delete such information from its records.

If the Firm changes this Website Privacy Policy in whole or in part the Firm will inform you by posting the revised Website Privacy Policy on the website. Your continued use of the website constitutes your agreement to abide by the Website Privacy Policy as changed and that such Website Privacy Policy shall apply to your personal information previously collected by the website. If you object to any such changes, your recourse shall be to cease using the website and you have the right to request removal of your personal information from our databases.

If you have questions or concerns regarding this Website Privacy Policy or if you wish to exclude your personal information from our databases please **contact us**.