

## Privacy Policy

We recognize the importance of keeping the information you (“you” or “your”) provide to us private and secure. This Policy applies, in general, to all Internet sites operated by or on behalf of us (the “Site”) and related services (the “Services”).

### 1. User Consent.

By using our Site or providing Personal Information to us, you are consenting to the collection, use and disclosure of your Personal Information as described in this Policy. If you do not consent to the collection, use and disclosure of your Personal Information as described in this Policy, do not use our Site.

### 2. Types of Information We Collect.

When we refer to "Personal Information" we mean information that allows someone to identify or contact you, including, for example, your name, address, telephone number, e-mail address, as well as any other non-public information about you that is associated with or linked to any of the foregoing information. When we refer to "Anonymous Information" we mean information that is not associated with or linked to your Personal Information and which cannot be identified as belonging to you.

We may collect Personal Information from you, such as your first and last name, mailing address, phone number, e-mail address, billing address, credit card or debit card information, PayPal account, and similar information when you create an account. Our Site may collect information from you, including your browser type, operating system, IP address, web pages visited, web pages viewed, buttons or links clicked, time spent on website, time spent on web pages, etc.

### 3. Use of Your Personal Information.

Whenever we collect Personal Information on our Site, we will:

- not disclose, transfer, sell or otherwise provide your Personal Information to any third party unless required by law or as expressly stated herein;
- provide timely and appropriate notice to you about our data practices through this Privacy Policy Statement;
- collect and use your Personal Information only with your consent, which may be express or implied, depending on the sensitivity of the Personal Information, legal requirements, and other factors;
- collect your Personal Information only for specific, limited purposes. The information we collect will be relevant, adequate and not excessive for the purposes for which it is collected;
- process your Personal Information in a manner consistent with the purposes for which it was originally collected or to which you have subsequently consented; and
- not use your Personal Information for direct marketing purposes without giving you an opportunity to “opt-out”.

We may use Personal Information:

- to create your membership or user profile account and provide the Services you request;
- to access the third party services you specifically request access to;
- to register you for a webinar or online workshop or streaming workshop;
- to place transactions or orders to purchase software, research or membership access;
- to provide support and assistance for email requests or questions related to our Services;
- to the extent you choose to participate, to conduct questionnaires and surveys in order to provide better Services and Products;
- to personalize marketing communications and website content based on your preferences, access level, user level, Services purchased;
- to provide improved administration of our Site and Services including billing, mailing, email, phone number, name updates or edits;
- to send you administrative e-mail notifications and other Services related communications;
- to send newsletters, surveys, offers, and other promotional materials related to our Services and for other marketing purposes;
- to contact you regarding opportunities to compensate you for your algorithm's performance;
- to share anonymized and/or aggregated algorithm performance statistics with third parties, for example potential investors or for marketing purposes; and
- to market our products and services (and those of third parties) to you that we believe may be of interest, both on and off the Site.
- to facilitate communication with other Members of the Site as you direct us through the Services.

#### 4. Control and Retention of Personal Information.

We will periodically send you free newsletters and e-mails that directly promote the use of our Site or Services. When you receive newsletters or promotional communications from us, you may indicate a preference to stop receiving further communications from us and you will have the opportunity to "opt-out" by following the unsubscribe instructions. Even if you opt-out of receiving marketing related email messages, we will continue to send you service related communications, including notices related to your Account or any updates to our Terms of Use or Privacy Policy. We retain the Personal Information collected on our Site as long as necessary to provide the services, products and information you request or as permitted by applicable law.

#### 5. Security of Personal Information.

Your Personal Information will generally be stored in our or our servers (which are hosted by a third party service provider) located in the United States. To the extent required by law, if your Personal Information will be transferred outside of this country, an appropriate notice will be provided. We maintain safeguards to protect the confidentiality, security and integrity of your Personal Information. However, as is the case with all computer networks linked to the Internet, we cannot guarantee the security of information provided over the Internet and will not be responsible for breaches of security unless we have acted in a grossly negligent manner.

## 6. Use of Anonymous Information.

We may create Anonymous Information records from Personal Information by excluding any information that makes the information personally identifiable to the data subject. We use this Anonymous Information so that we may enhance the content of our Services and improve Site performance. We reserve the right to use Anonymous Information for any purpose and disclose Anonymous Information to third parties at its sole discretion.

## 7. Third Party Service Providers.

We use software plugins and other third-party plugins on this site in order to facilitate and support our business and users. These plugins include payment gateways and other payment transaction processors, analytics and website tracking software, membership management and access delivery software, commenting and forum software, marketing and promotion software as well as video, audio, content, and social media plugins. The current list of active software plugins and third-party plugins we use on this site include: Google Analytics, Facebook, LinkedIn, Instagram, Vimeo, Pinterest, Stripe, PayPal, Disqus, OptimizePress, Co-Schedule, SEO Yoast, YouTube, Sumo, Amazon Web Services, Digital Ocean, Comodo Security Services, GoDaddy, Kraken Image Optimizer, Muut, Nav Menu Roles, My Page Order, Postman SMTP, Pretty Links, Really Simple SSL, Scarcity Builder, ShiftNav, Smart Podcast Player, UpdraftPlus, Askimet Anti-Spam, AnsPress, Sensei, WPBakery, AffiliateWP, EasyTables, Font Awesome, Post Expirator, Remove Query Strings, Thrive Quiz Builder, TinyMCE, Visual Composer, We Total Cache, Wordpress Importer, WP User Avatar, WebinarJam, Demio, SpeakPipe, OptinMonster, Join.me, LeadPages, SendHub, Calendly, SoundCloud, Libsyn, iTunes, GooglePlay, iHeart Radio, Stitcher, ActiveCampaign, MailChimp, PushCrew,

In general, the third-party providers used by us will only collect, use and disclose your information to the extent necessary to allow them to perform the services they provide to us as already outlined in the "We may use Personal Information" section above. However, certain third-party service providers, such as payment gateways and other payment transaction processors, have their own privacy policies in respect to the information we are required to provide to them for your purchase-related transactions. For these providers, we recommend that you read their privacy policies, so you can understand the manner in which your personal information will be handled by these providers. In particular, remember that certain providers may be located in or have facilities that are located a different jurisdiction than either you or us. So, if you elect to proceed with a transaction that involves the services of a third-party service provider, then your information may become subject to the laws of the jurisdiction(s) in which that service provider or its facilities are located.

In certain, limited circumstances we may be required to share or transfer Personal Information to other unrelated third parties. For example, we may provide Personal Information to a third party: (i) at your request; (ii) to comply with a legal requirement or court order; (iii) to investigate a possible crime, such as identity theft; (iv) in connection with the sale, purchase, investment in, merger, reorganization, liquidation or dissolution of our company or business; or (v) under similar

circumstances. If such an event occurs, we will take appropriate steps to protect your Personal Information.

#### 8. Third Party Websites.

Our Site may contain links to Internet sites that are not operated by us. These links are provided as a service and do not imply any endorsement of the activities or content of these sites, nor any association with their operators. We do not control these Internet sites and we are not and cannot be responsible for their content, security, or privacy practices. We urge you to review the privacy policy posted on those other websites you visit before using the site or providing Personal Information.

#### 9. Use of Cookies.

We use cookies on this site. We may link the information we store in cookies to any personally identifiable information you submit while on our site. We may use both session ID cookies and persistent cookies. We may use session cookies to make it easier for you to navigate our site. A session ID cookie expires when you close your browser. A persistent cookie remains on your hard drive for an extended period of time. You can remove persistent cookies by following directions provided in your Internet browser's "help" file. If you reject cookies, you may still use our site. Some of our business partners (e.g., our analytics provider) may use cookies on our site. We have no access to or control over these cookies. This privacy statement covers the use of cookies by us only and does not cover the use of cookies by any such firm. A cookie is a small text file that is stored on a user's computer for record-keeping purposes.

#### 10. Users Outside of the United States.

If you are a non U.S. user of the Site or Services, by visiting the Site and/or providing us with information, you acknowledge and agree that your Personal Information may be processed for the purposes identified in the Privacy Policy. In addition, your Personal Information may be processed in the country in which it was collected and in other countries, including the United States, where laws regarding processing of Personal Information may be less stringent than the laws in your country. By providing your information, you consent to such transfer.

#### 11. Security

We take reasonable measures to help protect information about you from loss, theft, misuse, and unauthorized access, disclosure, alteration, and destruction.

#### Transfer of Information to the U.S. and Privacy Shield

We are based in the United States and the information we collect is governed by U.S. law. By accessing or using the Service or otherwise providing information to us, you consent to the processing, transfer, and storage of information in and to the U.S. and other countries, where you may not have the same rights and protections as you do under local law.

If we transfer personal information from the European Union or Switzerland to the United States, we comply with the EU-U.S. and Swiss-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union and Switzerland to the United States. ID Experts has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/>.

If you have concerns about our compliance with the Privacy Shield program, you should contact us at [team@optionalalpha.com](mailto:team@optionalalpha.com).

If you are unable to resolve your concern or dispute with us, you may file a complaint with the Better Business Bureau, High Fidelity's designated independent dispute resolution provider, by visiting [www.bbb.org/EU-privacy-shield/for-eu-consumers/](http://www.bbb.org/EU-privacy-shield/for-eu-consumers/).

Under certain conditions specified by the principles of the EU-U.S. and Swiss-U.S. Privacy Shield Framework, you may also be able to invoke binding arbitration to resolve your complaint. We are subject to the investigatory and enforcement powers of the FTC. If we share EU or Swiss data with a third-party service provider that processes the data solely on our behalf, then we will be liable for that third party's processing of EU or Swiss data in violation of the Privacy Shield Principles, unless we are not responsible for the event giving rise to the damage.

## 12. Your Rights and Choices

### Account Information

You may update, correct or delete information about you at any time by requesting such deletion at [team@optionalalpha.com](mailto:team@optionalalpha.com).

You may exercise your right to withdraw your consent to the Service at any time. The withdrawal of consent will require deactivation of your account. To withdraw consent and deactivate your account, please contact support at [team@optionalalpha.com](mailto:team@optionalalpha.com). If you wish to exercise your right to data portability or right to erasure, please email us at [team@optionalalpha.com](mailto:team@optionalalpha.com), but note that we may retain certain information as required by law or for legitimate business purposes.

We may also retain cached or archived copies of information about you for up to 12 months. You have the right to lodge a complaint with a supervisory authority.

## 13. Children.

Our Services and Site are not directed to children and children are not eligible to use our Services. Protecting the privacy of children is very important to us. We do not collect or maintain Personal Information from people we actually know are under 13 years of age, and no part of our Site or Services is designed to attract people under 13 years of age. If we later learn that a user is under 13 years of age, we will take steps to remove that user's Personal Information from our databases and to prevent the user from utilizing the Site and the Services.

## 14. Changes in this Privacy Statement.

If we decide to change our privacy policy, we will post those changes to this privacy statement, the homepage, and other places we deem appropriate so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. We reserve the right to modify this privacy statement at any time, so please review it frequently. If we make material changes to this policy, we will notify you here, by email, or by means of a notice on our home page.

## 15. Contact Us.

If you have any questions or suggestions regarding our privacy policy, please contact us at [team@optionalalpha.com](mailto:team@optionalalpha.com), or mail us at:

Option Alpha / Alta5  
Attn: Privacy  
1600 West Ave #301  
Miami, FL 33139

### *Notice to California Residents:*

*If you are a California resident, California Civil Code Section 1798.83 permits you to request information regarding the disclosure of your Personal Information by High Fidelity to third parties for the third parties' direct marketing purposes. With respect to these entities, this Privacy Policy applies only to their activities within the State of California. To make such a request, please send an e-mail to [team@optionalalpha.com](mailto:team@optionalalpha.com) or write us at the address listed immediately above.*

Last Revised: May 25, 2018