

# RockStep Capital's Privacy Policy Statement

This document is compliant with General Data Protection Regulation (GDPR) European Union (EU), Canada, and California data protection and privacy requirements.

## Scope

RockStep Capital takes your privacy seriously. This policy explains how RockStep Capital collects, uses and protects Information submitted and collected as part of its web-based service and generally on its website (together, the Website).

## Collection

- Information means information that determines the identity of an individual.
- **Registration Data:** When registering on our Website you will provide Information (such as, company name, individual name, address, phone number and email address).
- **Cookies:** We use cookies to collect session information to provide a better user experience and to provide secure access to further site features such as investor portals. The cookies are stored on your computer. You can delete them or reject them; however, if you do, advanced site features may not function as expected due to secure access requirements.

## Uses

- **Use of Information:** We will use Information to provide our service, support, market additional services to you, and to improve our website.
- **Aggregate Non-Identifiable Information:** We use aggregate, non-identifiable information to improve our website.
- **Server Logs:** Our server logs record system information when you view our website.
- **Email Marketing:** You may receive marketing emails from us. You can always 'update your preferences' or 'unsubscribe' from those emails within the body of the email.
- **Automated Decision Making:** There is currently no automated decision making, such as profiling, taking place through our Website.
- **Service Providers:** We do not disclose Information to third parties, except to certain service providers, as follows:
  - Credit card processors,
  - Hosting providers, and
  - Other contractors providing services on our behalf.

## Disclosure and Sharing

- **Legal Requirements:** We may be required by law to disclose your Information, and we will try to take steps to limit any such disclosure.
- **Change of Ownership:** If we are acquired or otherwise sell our business, we will transfer all of the Information to the successor entity. We will try to notify you of any change in ownership or sale by either posting it on our site or by emailing you (at the email address in the system).

## Your Rights

- You can ask us what Personal Information we hold, about you, and you can ask us to access it, correct it if it is inaccurate, and restrict the processing of it, and erase it, under certain circumstances.

- To exercise your rights regarding your Personal Data by email, mail or phone, please use the contact information provided at the bottom of this policy. We will try to respond to all legitimate requests within one month and will contact you should we require additional information in order to honor your request. You may also complain to the supervisory authority of your Member State.

### For EU Data Subjects

In addition to the other rights set forth in this policy, if you are a Data Subject in the EU, and any Information that we collect falls under the definition of “Personal Information,” as that term is defined under the General Data Protection Regulation (GDPR), then the following applies:

As you register on our Website, your Personal Data is being stored outside of the EU on our servers in the United States. If we further transfer this Personal Data, it will be transferred to a Sub-Processor that (i) is located in a third country or territory recognized by the EU Commission to have an adequate level of protection; or (ii) we have entered into Model Contractual Clauses with; or (iii) has other legally recognized appropriate safeguards in place, such as the EU-US Privacy Shield or Binding Corporate Rules.

We will retain your Personal Information in accordance with our then current data retention policy, unless you otherwise request that it be deleted sooner, in accordance with this Privacy Policy.

### Other Terms

- **Application of this Policy:** By registering on our Website, you agree to comply with the terms of this Privacy Policy and that we may process your Information.
- **Industry Standard Security:** While we use industry standard security measures to protect against the loss, misuse and alteration of the Information under our control, there is no guaranty that it cannot be compromised.
- **No Under Age 13:** We do not intentionally gather Information about visitors who are under the age of 13.
- **Privacy Concerns:** To exercise your rights regarding your Information , or if you have questions regarding this Privacy Policy or our privacy practices, please contact us at:

RockStep Capital Compliance Officer  
1445 North Loop West, Suite 625  
Houston, TX 77008  
Phone: (713) 554-7600  
[info@rockstep.com](mailto:info@rockstep.com)

- **Links to Third Party Sites:** Our websites may contain links to other sites and services, which are owned and controlled by others. These websites have their own policies regarding privacy, and you should review those policies.
- **Revisions to this Policy:** We may change this policy at any time. Notice of any significant revision will be called out on this website for a period of time.