

PRIVACY POLICY

Introduction

Lampert Advisors, LLC and its affiliates (collectively, “Lampert,” or “we,” “us,” “our”) respect your concerns about personal data protection and value our relationship with you. This Privacy Policy (the “Policy”) applies solely to personal data collected through the ldx.exchange web site, mobile applications, sweepstakes, web pages, portals, interactive features, telephone support lines, e-mail, blogs and their respective contents in addition to our Twitter, Facebook or other social networking sites, and their respective contents (collectively, the “Site”), whether accessed via computer, mobile device or other device (collectively, “Device”).

This Policy describes the types of personal data we collect through the Site and how that personal data may be used and/or with whom it may be shared. This Policy also describes how you can reach us to update your contact information, access and control the use of the personal data we collect in connection with our marketing communications and activities, or get answers to questions you may have about our privacy practices at the Site. Please read this Policy carefully, because by using the Site you are acknowledging that you understand and agree to the terms of this Policy. In addition, please review the LDX User Agreement, which governs your use of the Site and any content you submit to the Site.

Scope

This Policy applies to all information and data collected by Lampert from you while using the Site.

Definitions

Except as otherwise defined in this Policy, capitalized terms have the meanings set forth herein.

“Identifiable natural person” means a person who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to his or her physical, physiological, mental, economic, cultural or social identity.

“Personal data” or “personal data” means any information about an identified or identifiable natural person.

Compliance with Local Laws

This Policy is meant to guide Lampert with respect to personal data collected from or about you at the Site. While this Policy applies to personal data generally, the local laws, rules and regulations of jurisdictions that are applicable to Lampert (“Local Laws”) may require standards which are stricter than this Policy and, in such event, Lampert will comply with applicable Local Laws. Specific privacy policies may be adopted to address the specific privacy requirements of particular jurisdictions.

Collection and Use of Personal Data

The privacy and security of the personal data that Lampert collects from you is a priority for Lampert. In order to use the Site, you must provide Lampert with personal data that could be used to contact you or to identify you personally such as your name, company name, business address, telephone number, credit card data, and e-mail address through the Site. By submitting personal data to Lampert at this Site, you hereby consent to Lampert’s collection, use and disclosure of such personal data.

Lampert collects and uses personal data for the following purposes:

- Lampert collects and uses personal data that you submit at our Site when you (i) register with Lampert for services, (ii) register your e-mail address with us, (iii) opt-in to receive newsletters or promotions, (iv) sign up for special offers from select third parties, (v) send e-mail messages or feedback, submit forms or transmit other information by e-mail, (vi) submit your credit card or other payment information when registering, or (vii) complete a survey. If you elect to engage in such activities, we ask that you provide us with personal data, such as your first and last name, company name, mailing address (including zip code), e-mail address, telephone number, credit card type and number, credit card security code, and other personal data. If you do not provide certain personal data with respect to a particular service, you will not be able to engage in that service.

- Lampert may also collect and use personal data that you submit at our Site to communicate with you, better understand your needs, and to provide you with better service. For example, when you visit our websites, or send e-mails to Lampert, you are communicating with us electronically and may be submitting personal data to Lampert. We may use this personal data to communicate with you either electronically, by e-mail, or using other means.
- We may also use your personal data that you submit to provide you with a more efficient and customized experience, improve our marketing and promotional efforts, statistically analyze Site use, improve our service offerings, and enhance our Site's content, layout, and services. We may contact you regarding administrative notices and/or send you occasional e-mails or regular mail regarding our services, special offers and other information that may be of interest to you. If you do not wish to receive this information, please click on the "Unsubscribe" link shown on all our e-mails and electronic newsletters to you or contact us at the address or telephone number listed herein and we will remove your name from our mailing lists.
- To help Lampert improve your experience on our Site Lampert may also track your use of our Site. We may collect certain non-personally identifiable information about you based upon how you search and interact with our Site, including which pages you view while visiting our Site. For system administration and statistical analysis purposes, this information is compiled and analyzed on both a personal and an aggregated basis. This information may include a website's Uniform Resource Locator ("URL") that you just came from, which URL you next go to, general geographic location, device type, what browser you are using, Internet service provider, date/time of visit information, operating system, and your Internet Protocol ("IP") address, which tells us the country and state you are searching our Site from. A URL is the global address of documents and other resources on the World Wide Web.
- We also may collect, or enlist a third-party service provider to collect, store, process and manage certain non-personally identifiable information to diagnose problems with our servers and software, administer our Site, connect you to the credit card payment platform and gather and analyze demographic and other statistical information. Our third-party service providers may also provide us with summary, but not individual, reports that will tell us how our Site is being used. We may also share such aggregate statistical and demographic information with select third parties, such as our partners; however, these reports do not contain any personal data.
- Any information you give us through this Site may be transmitted to servers outside the country where the information is entered, and may be used, stored, and processed outside the country where it was entered. As you browse our Site, our servers may collect information about your visit. For example, to help us better serve you and improve our Site, we may monitor statistics such as how many people visit our Site, which pages people visit on our Site, and which browsers people use to visit our Site.

Lampert also may use and disclose your personal data: (i) to the extent required to respond to a legal or ethical obligation, (ii) to the extent necessary to meet national security, public interest or law enforcement obligations, and (iii) to the extent expressly permitted by an applicable law, rule or regulation.

Of course, you may choose not to provide Lampert with personal data. However, this choice may prevent Lampert from providing you with the service, or information you requested or that could be offered to you. Additionally, Lampert collects or may collect personal data to conduct the business of Lampert and comply with applicable laws, rules and regulations.

Lampert may use your personal data as set forth in this Policy (or any other Lampert policy, as applicable), and for any other purposes for which your consent is required under applicable law so long as Lampert obtains your consent.

Additionally, where Lampert is permitted to do so under applicable law, Lampert may share your personal data with its affiliates, employees, contractors, consultants and other parties who assist Lampert including, without limitation, parties that provide information technology and data processing services to Lampert with respect to the operation of its businesses.

Where Lampert is permitted to do so under applicable law, Lampert may transfer or provide your personal data to affiliates or third parties both in and outside of the nation where you reside.

Additionally, your personal data may be disclosed as required by applicable law, to comply with a court order, subpoena, warrant or other legal process, or where the personal data is publicly available (unless otherwise restricted by applicable law).

Cookies

Like many websites, Lampert uses “cookies” and similar tools on the Site to improve its performance and enhance your user experience.

What are Cookies?

A cookie is a small text file which is placed on your Device. Cookies help to analyze web traffic and allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences. Certain cookies may contain personal data – for example, if you click to “remember me” when logging in, a cookie may store your username. Most cookies will not collect personal data that identifies you, and will instead collect more general information, such as how users arrive at and use our Sites, or a user’s general location.

What do we use Cookies for?

Lampert may place cookies or similar files on your Device for security purposes, to tell us whether you have visited the Site before, if you are new visitor or to otherwise facilitate site navigation, and to personalize your experience while visiting our Site. Cookies allow us to collect technical and navigational information, such as browser type, time spent on our Site and pages visited. Cookies also allow us to select which of our advertisements or offers are most likely to appeal to you and display them while you are on the Site. Cookies may enhance your online experience by saving your preferences while you are visiting a particular Site. Overall, cookies help us provide you with a better Site by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your Device or any information about you, other than the data you choose to share with us.

What kinds of Cookies do we use?

Generally, the cookies that are used on the Site can be broken down into the following categories:

- Session Cookies - These cookies are used 'in-session' each time you visit and then expire when you leave a Site or shortly thereafter: they are not stored on your Device permanently, do not contain any personal data and help by minimizing the need to transfer personal data across the internet. These cookies can be deleted or you can refuse to allow their use, but this will hamper the performance and your experience in using the Sites. These cookies also take time stamps that record when you access a Site and when you leave a Site.
- Tracking Cookies - These cookies enable us to recognize repeat visitors to our Site. By matching an anonymous, randomly generated identifier, a tracking cookie keeps track of where a user of our Site came from, what search engine they may have used, what link they clicked on, what keyword they used and where they were in the world when they accessed a Site. By monitoring this data, we can make improvements to our Site.
- Persistent Cookies - This type of cookie is saved on your Device for a fixed period (sometimes for a few hours, sometimes for a year or longer) and is not deleted when the browser is closed. Persistent cookies are used where we need to remember who you are for more than one browsing session. For example, this type of cookie can be used to store your preferences, so that they are remembered for the next visit to a Site.
- Performance or Analytical Cookies - Performance cookies are used to analyze how the Site is used and to monitor its performance, which allows us to improve your experience in using the Site. These cookies help us to tailor the content of the Site to reflect what the Site users find most interesting and to identify when technical issues with the Site arises. We may also use this data to compile reports to help us to analyze how a Site is used, what the most common issues are and how we can improve the Site.

Can the Cookies be blocked?

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you would prefer not to accept cookies, most browsers will allow you to: (i) change your browser settings to notify you when you receive a cookie, which lets you choose whether or not to accept it; (ii) to disable existing cookies; or (iii) to set your browser to automatically reject any cookies. However, please be aware that if you disable or reject cookies, some features and services on our Sites may not work properly because we may not be able to recognize and associate you with your Lampert account(s). In addition, the offers we provide when you visit us may not be as relevant to you or tailored to your interests.

Instructions for blocking or allowing Cookies in Popular Web Browsing Software

- Microsoft Edge
- Firefox
- Google Chrome
- Apple Safari
- AboutCookies.org

Opting out

Even after you have consented to Lampert's collection and use of your personal data and submitted personal data to Lampert at this Site, you may opt-out of having your personal data collected, used or transferred by Lampert by contacting Lampert. Please note that in order to fulfill certain obligations, we may need to continue sending you notices or other important information concerning any events or services you request. You may contact Lampert by sending us a letter at:

Lampert Debt Xchange

900 Third Avenue, 14th Floor

New York, NY 10022

Attention: Privacy Officer

Or by e-mail to: Info@ldx.exchange

Or by telephone at: (347) 614-4775

General Principles for the Processing of Personal Data

Personal data will be collected, stored, processed and transmitted in accordance with Lampert's established policies and applicable federal, state, local and foreign laws, rules and regulations.

The principles of Lampert with respect to the processing of personal data are as follows: (i) personal data will be processed fairly and lawfully, (ii) personal data will be collected for specified, explicit, and legitimate purposes and not further processed for incompatible purposes, (iii) personal data collected by Lampert will be adequate, relevant, and not excessive in relation to the purposes for which it is collected, (iv) personal data collected by Lampert will be accurate and, where necessary, kept up to date, and (v) personal data collected by Lampert will be retained as identifiable data for no longer than necessary to serve the purposes for which the personal data was collected.

If Lampert engages in the processing of personal data for purposes other than those specified in this Policy, Lampert will provide notice of these changes, the purposes for which the personal data will be used, and the recipients of personal data.

Transfers of Personal Data

Lampert may transfer your personal data in connection with a merger, consolidation, or reorganization of the assets of Lampert or affiliates, or other transaction, or by way of assignment (whether by operation of law or otherwise) in connection with any such or similar transaction or in connection with the administration of a bankruptcy estate.

However, your personal data will continue to be protected by any pre-existing privacy policy of Lampert, unless you agree otherwise. Your personal data may become the property of the successor and, subject to your agreement, will be subject to the successor's privacy policies.

We do not sell any of your personal data (including your name, mailing address, or e-mail address) to any companies. We do provide some of our services through contractual arrangements with affiliates, service providers, and other third parties that require us to share your personal data to them in order to deliver those services. For example, we must release your credit card information to the card-issuing bank to confirm payment for services purchased on this Site. We require our service providers to adopt and post privacy policies consistent with this Policy.

Linking to and Privacy Policies of Third-Party Sites

This Policy applies to information collected from this Site by Lampert. Once you click on a link to another website (the "Linked Site"), you are no longer on this Site. This Policy does not apply to the content or privacy practices of any Linked Site. We encourage you to read the privacy statements of each and every website or Linked Site that collects personal data. You should contact advertisers, other websites or Linked Sites directly if you have any questions about their privacy policies or their use of the information they collect.

Miscellaneous Privacy Issues

Lampert is committed to protecting the privacy of children. Our policy is that we do not knowingly collect, use or disclose personal data about visitors that we know are under 13 years of age. This Site is not directed in any respect to children under the age of 13.

Use Registration and Password

Ultimately, you are solely responsible for maintaining the secrecy of your password and/or account information. To ensure the effectiveness of your password, we recommend that you do not disclose your user identification or password to anyone. Please be careful and responsible whenever you are online.

Security

Lampert will take reasonable steps to protect the personal data in its possession from loss, misuse, unauthorized access, disclosure, alteration, and destruction, and will take all useful precautions with regard to the nature of the data and the risks of the processing, to preserve the security of the data and, in particular, prevent its alteration and damage or access by non-authorized third parties. Lampert has put in place appropriate technical, physical, and organizational procedures and security measures to safeguard and secure the personal data from destruction, loss, alteration, unauthorized access or disclosure, or other forms of unauthorized or unlawful processing commensurate with the risks posed by the particular type of processing, the nature of the personal data and in accordance with applicable law and applicable guidelines, and taking into consideration the cost of implementing such measures.

Accuracy

It is your responsibility to provide Lampert with accurate personal data. Except as otherwise set forth in this Policy, Lampert shall only use personal data in ways that are compatible with the purposes for which it was collected or subsequently authorized by you. To the extent necessary for these purposes, Lampert shall take reasonable steps to ensure that personal data is accurate, complete, current and relevant to its intended use.

Access

Upon request by you, Lampert will grant you reasonable access to your personal data. Except where your rights are limited by applicable law (e.g., where necessary to safeguard national security, defense, or public security, for the prevention and detection of crime, or to safeguard an important economic or financial interest of the nation in which you reside, the employee, or the rights and freedoms of others, for the purpose of scientific research or statistical purposes, provided that the data is not used for making decisions that relate to a particular individual), such access will include: (i) confirmation as to whether or not your personal data is being processed and, if so, information as to the purposes of the processing, the categories of personal data processed, and the recipients (or categories of recipients) of the personal data; (ii) communication in intelligible form of the personal data undergoing processing

and information as to its source; and (iii) details of the logic involved in any automatic processing of the personal data. Lampert will permit you to correct, amend or delete inaccurate or incomplete personal data, except where the burden or expense of providing access would be disproportionate to the risks to the privacy of the individual in the case in question or where the rights of persons other than the individual would be violated.

Subject to the above, you may change any of the personal data you have provided to us on this by writing us at: Lampert Advisors LLC, 900 Third Avenue, 14th Floor, New York, NY 10022, Attention: Privacy Officer, by e-mail at info@ldx.exchange or by phone at (347) 614-4775. Please include your name, address, and/or e-mail address when you contact us.

We will only keep your personal data as long as we need it for the reasons it was originally collected from you. When we no longer need your personal data for our purposes, we will destroy, delete or erase that information or convert it into an anonymous form in accordance with our standard data retention and destruction policies. You may ask to have the information on your account deleted or removed; however, because we keep track of past transactions, you cannot delete information associated with past transactions on this Site. In addition, it may be impossible to completely delete your information without some residual information because of backups.

Compliance

Lampert will use a self-assessment approach to verify compliance with this Policy and periodically verify that the Policy is accurate, comprehensive for the information intended to be covered, prominently displayed, implemented and accessible.

If you believe that your personal data has been processed or disclosed in violation of this Policy, Lampert encourages you to raise any concerns using the contact information provided in this Policy. Lampert will investigate and attempt to resolve any complaints and disputes regarding use and disclosure of personal data.

Changes to this Policy

This Policy may be amended from time to time, consistent with the requirements of applicable law. A notice will be posted by Lampert on this Site when this Policy is changed.