



PRIVACY POLICY Effective Date: 12-21-2016

By accessing and using the websites WWW.MERITHARBORCAPITAL.COM (the "Websites"), you consent to the collection and use of information as described in this Privacy Statement. Please read this Privacy Statement carefully before using the Website. Note that your use of the Website is also governed by the Website Terms and Conditions found on the Website and any additional Terms of Use that may be agreed between you and Carrollton Capital Partners, LLC, d/b/a Merit Harbor Capital. This privacy statement applies to www.meritharborcapital.com. This privacy statement describes how Merit Harbor Capital collects and uses the personally identifiable information you provide on the Website: www.meritharborcapital.com. It also describes the choices available to you regarding our use of your personally identifiable information and how you can access and update this information.

COLLECTION AND USE OF PERSONALLY IDENTIFIABLE INFORMATION

Some of the functionalities or services offered through the Website may require users to register and provide certain information in connection with the registration process. Such information may include personally identifiable information ("Personally Identifiable Information") such as your name, company name, address, phone number, email address, and confidential password. Anything that you transmit to this Website or Personally Identifiable Information provided by you in connection with your use of this Website becomes the property of Merit Harbor Capital and may be stored, processed and/or used by Merit Harbor Capital for any lawful purpose and is subject to disclosure as deemed appropriate by Merit Harbor Capital. Additionally, if you are a registered user, you consent to Merit Harbor Capital tracking your use of the non-public functionalities and services available on the Website and for which you are registered. Merit Harbor Capital may use all such information for purposes including providing and administering the service for which you are registered, facilitating your use of the Website, securely identifying you when you log in to the Website, producing reports, providing quality assurance, and contacting you if necessary concerning your auction transaction, trade, or other Website activity.

INFORMATION SHARING

Merit Harbor Capital does not sell or market your Personally Identifiable Information to any unaffiliated third parties, absent your prior consent or as otherwise set forth in this Privacy Statement. We may provide your Personally Identifiable Information to unaffiliated third party service providers, suppliers or agents as necessary to effectively provide you with the Website functionalities

and services for which you have registered. We will use reasonable efforts to maintain the security and confidentiality of your Personally Identifiable Information, in accordance with the Terms and Conditions and any Terms of Use that govern your use of the Website and any service or functionality for which you are registered. These companies are authorized to use your personally identifiable information only as necessary to provide these services to us. Personally, Identifiable Information may be disclosed by Merit Harbor Capital as needed to comply with all appropriate and applicable regulations and laws, such as to comply with a subpoena, or similar legal process, and in response to a request or demand for such information made by any governmental entity, including law enforcement and regulatory agencies. If Merit Harbor Capital is involved in a merger, acquisition, or sale of all or a portion of its assets, you will be notified via email and/or a prominent notice on our Website of any change in ownership or uses of your personally identifiable information, as well as any choices you may have regarding your personally identifiable information.

SECURITY

We will use reasonable efforts to maintain the security and confidentiality of your Personally Identifiable Information, in accordance with the Terms and Conditions and any Terms of Use that govern your use of the Website and any service or functionality for which you are registered. We follow generally accepted standards to protect the personally identifiable information submitted to us, both during transmission and once we receive it. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, we cannot guarantee its absolute security.

USE OF COOKIES

Merit Harbor Capital may collect Website use information as participants navigate the Website through the use of "cookies", which are small text files that your web browser places on your computer's hard drive to assign an identification code to your computer for record-keeping purposes. Cookies are an industry standard used by most major websites. We use session ID cookies. A session ID cookie expires when you close your browser. We use session ID cookies to make it easier for you to navigate our Website. While cookies identify a particular computer, they do not identify a particular user. Merit Harbor Capital uses cookies to collect certain information automatically from users on an anonymous basis and store it in log files. The information collected in this manner includes a user's site referral information, browsing patterns, and technical information. Such anonymous information may be used by Merit Harbor Capital to, among other things, improve the operation of the Website. If you reject cookies, you may still use our Website, but your ability to use some areas of our site will be limited. The use of cookies by our partners is not covered by our privacy statement. We do not have access or control over these cookies.

PROMOTIONAL MATERIALS

You may receive promotional materials from Merit Harbor Capital and from Merit Harbor Capital's affiliates concerning products and services. However, Merit Harbor Capital provides users with the opportunity to opt-out of receiving these promotional materials. Users may click on "unsubscribe" link included in each email or you may email us at info@meritharborcapital.com.

LINKS The Merit Harbor Capital Website provides hyperlinks, which may take you to other websites that are not owned or operated by Merit Harbor Capital. These sites may contain privacy provisions that are different from those provided herein. We are not responsible for such provisions, and we expressly disclaim any and all liability related to such provisions.

SOCIAL MEDIA WIDGETS

Our Website includes Social Media Features, such as the Facebook and Twitter buttons or interactive miniprograms that run on our Website. These Features may collect your IP address, which page you are visiting on our Website, and may set a cookie to enable the Feature to function properly. Social Media Features and Widgets are either hosted by a third party or hosted directly on our Website. Your interactions with these Features are governed by the privacy statement of the company providing it.

PROVIDING AND UPDATING USER PERSONAL INFORMATION

If you are submitting Personally Identifiable Information on behalf of others who will be designated by your institution as registered users of the Website, you represent that you have full authorization to provide this information to Merit Harbor Capital. Merit Harbor Capital offers users who have provided Personally Identifiable Information to Merit Harbor Capital an opportunity to review the information provided to update or correct any errors. Users can update, correct or amend their submitted Personally Identifiable Information by making the change on our member information page on their online accounts. If you want to delete/deactivate your account, you may send us such request at info@meritharborcapital.com. We will respond to your request within 30 days. We will retain your information for as long as your account is active or as needed to provide you services. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

AMENDMENTS TO PRIVACY STATEMENT

This Privacy Statement is subject to amendment from time to time. Please visit this section of the Website periodically for changes and updates to the Privacy Statement. If we make any material changes, we will notify you by email (sent to the e-mail address specified in your account) or by means of a notice on this Website prior to the change becoming effective. By continuing to access and use the Website after any such revisions or updates are made, you agree that you are consenting to be bound by such revisions or updates. If you have any questions or concerns regarding this privacy statement, you may contact us at:

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