

## **Internet Privacy Policy**

This privacy policy (the “Privacy Policy”) discloses the privacy practices for ProcureETFs.com, and applies solely to information collected by this website or as relevant to digital communications associated with this website, including email and social media. We are not responsible for the content or information of any third-party websites to which our site refers or links. We implore you to read their policies regarding privacy.

### **Information We Collect or Obtain**

ProcureAM, LLC (“Procure”) may collect or obtain personal information from you through the site, including but not limited to information you provide when you:

- Download educational, marketing or research collateral; or
- Contact us with questions or requests for information

For purposes of this Privacy Policy, “personal information” includes information that can be used to identify you, such as your name, address, company affiliation, e-mail address, phone number, or investor type.

### **Cookies**

A cookie is a small text file placed on your computer. Most browsers are set to accept cookies by default. If you prefer, you can usually set your browser to disable cookies, or to alert you when cookies are being sent. Similarly, many mobile devices allow you to disable the ability for geo-location information to be collected from your mobile device. If you do disable cookies or refuse to accept a request to place a cookie, it is possible that some parts of the site will not function properly.

### **Collection of Information Using Cookies and Other Tools**

Procure may use “cookies” or other electronic tools to collect information such as:

- IP address;
- Browser type;
- Operating system;
- Computer platform;
- Information about your mobile device;
- Geo-location data; and
- The state or country from which you accessed the site

Procure may also use cookies or other electronic tools to collect and compile statistical and other non-personal information about your use of the site and the services provided on the site, such as:

- The web pages you visit on the site;

- The date and time of your visit;
- The number of links you click within the site;
- The functions and features you use on the site;
- The searches you request on the site;
- The data you save on or download from the site; and
- The websites you visited immediately before and after visiting our site

### Using Your Information

Procure uses the information collected through the site for purposes such as:

- To enhance your experience with the site;
- To provide you with the services or information that you request;
- To communicate with you (e.g., to provide information about products or services in which you have indicated an interest);
- To combat fraud;
- To fulfill any other purpose for which you provided the information;
- To conduct research and analysis (anonymously and in the aggregate); and
- To provide promotional information to you regarding our products and services

To assist us with the uses described in this Privacy Policy, information we have collected from or about you through the site may be combined with or enhanced by other information about you that we have from other online or offline sources, including from our service providers.

### Sharing Your Information

Procure may share your personal information with our affiliates and subsidiaries under narrow circumstances, including but not limited to:

- With our service providers that help us to operate our business (e.g., to deliver the information or services requested by you; to perform other activities related to such information or services; and to provide you with promotions from Procure);
- In connection with any proposed or actual sale or other transfer of some or all assets of Procure, and/or any proposed or actual sale or merger of Procure (including in the event of a reorganization, dissolution or liquidation);
- As otherwise required or permitted by law; and/or
- Any other sharing to which you consent

We may also share your personal information with nonaffiliated third parties, such as Google Analytics, that use technologies such as cookies to help us analyze how visitors use the site. The information collected through these means (including IP address) is disclosed to these service providers, who use the information to evaluate use of the site. To learn more about Google Analytics and how to opt out, please visit [www.google.com/analytics/learn/privacy.html](http://www.google.com/analytics/learn/privacy.html).

## Security

We take precautions to protect your information. When you submit sensitive information via the site, your information is protected both online and offline. Only employees who need the information to perform a specific job are granted access to personally identifiable information. The computers/servers in which we store personally identifiable information are kept in a secure environment.

## Email Communications

You can unsubscribe or choose not to receive promotional materials from Procure by following the specific instructions in the e-mail or other communication you receive or by e-mailing us at [info@procuream.com](mailto:info@procuream.com). Please note that it may take some time to process your request, consistent with applicable law.

## Social Media

Procure and select employees maintain profiles and/or pages on various social media sites, including but not limited to Twitter, Facebook, YouTube, and LinkedIn. If you choose to “Follow” Procure on Twitter, Facebook, YouTube or LinkedIn or take any similar action on another social media site, you are providing your consent to receive informational updates, including solicitations, from Procure. To stop receiving this information from Procure on a social media site, you must follow the procedure established by the site. For example, on Twitter, you must click “Unfollow” on Procure’s profile page.

The information contained in Procure’s social media profiles and pages is current as of the date of publication (or such earlier date as referenced) and is subject to change without notice. Procure has no obligation to update any or all of such information. Additionally, Procure personnel other than the author(s) may provide oral or written market commentary or investment ideas to Procure’s clients or prospects that differ from the views expressed.

All amounts, market value information, and estimates have been obtained from outside sources where indicated or represent the good faith judgment of Procure. Where such information has been obtained from outside sources, Procure cannot guarantee its accuracy or completeness. Past performance is not a guarantee or reliable indicator of future results. Procure’s social media profiles and pages are not intended to be an offer or solicitation with respect to the purchase or sale of any security or other financial instrument or any investment management services. They are provided for information purposes only, do not constitute investment advice, and should not be used as the basis for any investment decision. They also do not purport to provide any legal, tax, or accounting advice.

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advertising, products, advice, opinions, recommendations, terms of use or privacy policies, or other materials on or available from third parties.

While Procure may monitor postings by third parties on its profiles and pages, Procure is not able to review them before they are displayed. That being the circumstance, any such postings are the views and responsibilities of the posters. Procure does reserve the right to edit or remove any post for any reason and to block followers to the extent permitted by the sites. Be advised that if Procure does not remove a third-party post, it is not an endorsement of the content.

Procure does not provide customer service, conduct financial transactions, or accept customer complaints through its social media profiles and/or pages. Never disclose account or other personal financial information on any of our social media profiles or pages.

### Questions Regarding this Privacy Policy

If you have questions regarding the Privacy Policy, please contact us at [info@procuream.com](mailto:info@procuream.com)

### Changes to the Privacy Policy

Our Privacy Policy may change from time to time and all updates will be posted on this page.

**If you feel that we are not abiding by this Privacy Policy, you should contact us immediately via telephone at (215) 486-7242 or by email at [info@procuream.com](mailto:info@procuream.com).**

Effective Date: April 1, 2019

**This document does not constitute an offer to sell or the solicitation of an offer to buy any security or investment product and should not be construed as such.**

**Any investment product, strategy, or product design that is described within this website may not be suitable for all types of clients.**

**All investing involves risk including the possible loss of all amounts invested. Prospective clients should not rely solely on this information in making their investment decision, but should make an independent review of all available facts and information regarding investments into ProcureAM ETPs, indexes, or intellectual property, including the economic benefits and risks of pursuing any of these strategies.**

**Any investment decision should be based on the individual circumstances of the beneficial owner. Registration with the Securities Exchange Commission (“SEC”) does not imply a certain level of skill, training or endorsement by the SEC, Finra or other government regulatory authority.**