



Comprehensive Fund Services.  
Invested In Our Clients' Success.

## ONLINE PRIVACY POLICY

July 2018

This online privacy policy (this "Policy") describes the types of information we may collect from you or that you may provide when you visit a Gemini Companies website (a "Website") and our practices for collecting, using, maintaining, protecting, and disclosing that information.

This Policy applies to information we collect:

- On our Website, which is located at [www.thegeminicompanies.com](http://www.thegeminicompanies.com), [www.geminifund.com](http://www.geminifund.com), [www.geminialt.com](http://www.geminialt.com), and [www.geminihedgefund.com](http://www.geminihedgefund.com);
- In email, text, and other electronic messages between you and our Website; and/or
- When you interact with our advertising and applications on third-party websites and services.

It does not apply to information collected by:

- Us offline or through any other means, including on any website that may be operated by any third party; or
- Any third party, including through any application or content (including advertising) that may linked to or be accessible from or on our Website.

Please read this Policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is to not use our Website. By accessing or using our Website, you agree to this Policy. This Policy may change from time to time (see Changes to the Policy). Your continued use of our Website after we make changes is deemed to be acceptance of those changes, so please check the Policy periodically for updates.

### Children Under the Age of 13

Our Website is not intended for children under 13 years of age. No one under age 13 may provide any personal information to or on our Website. We do not knowingly collect personal information from children under 13. If you are under 13, do not use or provide any information on our Website or on or through any of its features, register on our Website, or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us at [privacy@thegeminicompanies.com](mailto:privacy@thegeminicompanies.com).

### Information We Collect About You and How We Collect It

We collect several types of information from and about users of our Website, including information:

- By which you may be personally identified, such as name, mailing address, e-mail address, telephone, fax or mobile number, Social Security number, date of birth, account number, securities or other asset ownership information ("personal information"); and
- About your internet connection, the equipment you use to access our Website and usage details.

We collect this information directly from you when you provide it to us and automatically as you navigate through the Website and from third parties.

### *Information You Provide to Us.*

The information we collect on or through the Website may include:

- Information that you provide by filling in forms on our Website. This includes information provided at the time of registering to use our Website, subscribing to our services, posting material, or requesting further services. We may also ask you for information when you report a problem with our Website.
- Records and copies of your correspondence (including email addresses), if you contact us.
- Your search queries on the Website.

### ***Information We Collect Through Automatic Data Collection Technologies.***

As you navigate through and interact with our Website, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- Details of your visits to our Website, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Website; and
- Information about your computer or other device you use to visit our Website and your internet connection, including your IP address, operating system, browser type and version, domain, and other system settings, as well as the language your system uses and the country and time zone where your device is located.

The technologies we use for this automatic data collection may include:

- *Cookies (or browser cookies).* A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website.
- *Web Beacons.* Pages of our Website may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Gemini Companies, for example, to count users who have visited those pages and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).
- *Web Analytic Tools.* Our Website may use Google Analytics or similar web analytics tools that help website owners analyze the traffic to their websites. By using Google Analytics, the Gemini Companies may be able to view a variety of reports about how users interact with the Website, which can be used to improve your user experience and the overall quality of the Website.

### **Sensitive Personal Information**

The Gemini Companies recognize that certain jurisdictions have enacted laws that require higher protection of certain sensitive personal information. “Sensitive personal information” includes categories of personal data identified by European and other data privacy laws as requiring special treatment. This may include personal identity numbers; racial or ethnic origin; political opinions; religious, philosophical, or other similar beliefs; membership of a trade union or profession or trade association; physical or mental health; biometric or genetic data; sexual life; or criminal record (including suspected criminal activities).

In cases where we do seek to collect such information, we will seek to do so in accordance with applicable data privacy law requirements. If you choose to provide us with unsolicited sensitive personal information, you consent to us using the information, subject to applicable law as described in this online privacy statement.

### **How We Use Your Information**

We use information that we collect about you or that you provide to us, including any personal information:

- To present our Website and its contents to you.
- To respond to your inquiries and fulfill your requests.
- To inform you about information regarding the Website, products or services for which you apply or may be interested in, changes to terms, conditions, and policies and/or other administrative information.
- To deliver marketing communications that we believe may be of interest to you, including ads or offers tailored to you.
- To provide you with notices about your account, including expiration and renewal notices.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.

- To verify your identity and/or location (or the identity or location of your representative or agent) in order to allow access to your accounts, conduct online transactions and to maintain measures aimed at preventing fraud and protecting the security of account and personal information.
- To allow you to participate in interactive features on our Website, including surveys and other forms of market research.
- To help us to improve our Website and to deliver a better and more useful experience to our customers and to understand which parts of our Website, products, and services are of most interest.
- For risk control, fraud detection and prevention, to comply with laws and regulations, and to comply with other legal process and law enforcement requirements.
- In any other way we may describe when you provide the information.
- For any other purpose with your consent.

## Disclosure of Your Information

Please see the Gemini Companies [privacy policy](#) for information on how personal information may be shared with third parties. Additionally, we may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

## Choices About How We Use and Disclose Your Information

We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:

- You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies, please note that some parts of this Website may then be inaccessible or not function properly.
- We do not control third parties' collection or use of your information to serve interest-based advertising. However these third parties may provide you with ways to choose not to have your information collected or used in this way.

## Accessing and Correcting Your Information

You can review your personal information by logging onto the Website and visiting your account profile page. You may correct certain pieces of personal information on our Website by visiting your account profile page. For other types of information, you may contact us to correct any inaccurate information by emailing [privacy@thegeminicompanies.com](mailto:privacy@thegeminicompanies.com).

## Your California Privacy Rights

California Civil Code Section 1798.83 permits users of our Website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email to [privacy@thegeminicompanies.com](mailto:privacy@thegeminicompanies.com) or write us at 17605 Wright Street, Omaha, NE 68130, Attention: Legal Department.

## Data Security

We have implemented measures designed to secure, to the best of our ability, your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

## **Changes to the Policy**

It is our policy to post any changes we make to our Policy on this page. If we make material changes to how we treat our users' personal information, we will notify you through a notice on the Website. The date the Policy was last revised is identified at the top of the page. You are responsible for periodically visiting our Website and this Policy to check for any changes.

## **Contact Information**

To ask questions or comment about this Policy and our privacy practices, contact us by email at [privacy@thegeminicompanies.com](mailto:privacy@thegeminicompanies.com).

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