

Website Privacy Policy

Introduction

The Minnesota Advisory Group (“Company”, “our”, “us”, or “we”), the “data controller” of the personal information we collect about you pursuant to this Privacy Statement, is committed to protecting your privacy. This Privacy Statement details the steps we take to protect your personal information when you visit any of our websites or applications that contain a link to this Privacy Statement (collectively, our “Sites”) or when you contact us. It describes how we process personal information relating to you, including the types of personal information that we collect, the purposes for which we use it, the types of third parties with which we share it, and any rights you may have with respect to such information. Personal information is information, or a combination of pieces of information, that allow you to be identified.

This Privacy Statement applies only when you visit any of our Sites that link to this Privacy Statement or when you contact us, for example, with a comment, inquiry or customer support request. Personal information collected about you in connection with other Company websites, products, services or mobile applications (including those made available to you by our group companies) may be covered by different privacy statements. It is important that you read this Privacy Statement together with any other privacy statements or other notices we may provide to you on specific occasions when we are collecting or processing your personal information so that you are fully aware of how and why we are using your information.

By using or accessing our Sites or contacting us you agree that we may process your personal information in the manner described in this Privacy Statement. Your use of our Sites and any information you provide through them is subject at all times to this Privacy Statement and the applicable terms and conditions that apply to the Sites.

IMPORTANT NOTICE FOR RESIDENTS OF THE EUROPEAN ECONOMIC AREA (EEA) : EEA RESIDENTS MAY BE ENTITLED TO OBJECT TO CERTAIN TYPES OF PROCESSING ACTIVITIES INVOLVING YOUR PERSONAL INFORMATION DESCRIBED IN THIS PRIVACY STATEMENT, INCLUDING WHERE WE ARE RELYING ON A LEGITIMATE INTEREST TO PROCESS YOUR PERSONAL INFORMATION OR WHERE WE ARE PROCESSING YOUR PERSONAL INFORMATION FOR DIRECT MARKETING. IN SOME CASES, WE MAY DEMONSTRATE THAT WE HAVE COMPELLING LEGITIMATE GROUNDS TO CONTINUE TO PROCESS YOUR PERSONAL INFORMATION IN WHICH CASE WE ARE NOT OBLIGED TO COMPLY WITH YOUR REQUEST

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1) Our collection of information

a) Information collected directly from you. When you visit our Sites, we may ask you for personal information to provide a service or carry out a transaction that you have requested. You may also provide personal information to us when you contact us (e.g., with a comment, inquiry or customer support request) or register for an account to use our Sites.

The personal information we collect from you when you use our Sites may include:

1. Identity data, such as your name, title, company/organization name, e-mail address, telephone and fax numbers and physical address (including street, city, state, postal code, and/or country);

- Registration data, such as information provided by you when you register for an account to use our Sites, including user names and passwords;
- Recruitment data, including information submitted in connection with a job application or inquiry (as described below);
- Marketing and communications data, including your marketing preferences and your subscriptions to our publications;
- Financial information, including credit card or other financial account information for the purpose of enabling us to facilitate your purchase of Company products and services that may be available on our Sites;
- Export control information, such as your nationality, citizenship and country of residence, that allows us to determine your eligibility under export control regulations to receive information about certain technologies;
- Transaction data, including inquiries about and orders for our products and services and details of payments to and from you;
- Event registration information, including information you provide when filling in e-registration forms; and your feedback, including feedback from you about our Sites as well as our products and services generally.

When you do not provide requested information, we may not be able to provide you the requested service or complete your transaction. Information we collect about you. We collect certain information about your visit to our Sites, including:

Usage data, including information about how you use our Sites, what pages you view, the number of bytes transferred, the links you click, the materials you access, the date and time you access the Site, the website from which you linked to one of our Sites and other actions taken within the Sites; and

Technical data, such as your Internet Protocol (IP) address, your browser type and capabilities and language and your operating system.

For information about the cookies we use on our Sites, please refer to the section entitled “Cookies” .

c) Geo-location information. For certain Sites, with your express consent, we may collect the precise, real-time location (i.e., geo-location) of your mobile device. This information will be used only for purposes of facilitating your use of the Sites. The geo-location of your mobile device may be disclosed to our service providers who may process this information in connection with providing services on our behalf. Once you have consented to the collection of the precise, real-time location of your mobile device, you may adjust this consent by managing your Location Services preferences through the settings of your mobile device.

d) Information collected from third parties. In accordance with applicable law, we may collect personal information about you from third parties, such as social media websites/applications, which we may combine with the information we already hold about you in order to help us improve and customize our Sites to your preferences and for other purposes set forth in this Privacy Statement.

2) Our use of information

We may use the personal information collected via our Sites or when you contact us for purposes that include:

1. Services and transactions. We may use your personal information to deliver services to you or carry out transactions you have requested, including, but not limited to, providing information on Company products or services you have purchased or otherwise use, registering purchased products, processing product orders, handling warranty claims, replacing product manuals, answering customer service requests and facilitating the use of our Sites.

- Administering and protecting our business and Sites. We may use your personal information to administer and protect our business and our Sites, including troubleshooting, system maintenance, support, reporting and hosting of data.
- Improving our business, Sites, products and services. We may use your personal information to perform business analyses or for other purposes that help us to develop and improve the quality of our business, Sites, products and services (including new products and services), for example, by customizing our Sites to your particular preferences or interests.
- Marketing. In accordance with applicable laws and regulations, we may use your personal information to inform you of products or services which may be of interest to you, and to otherwise communicate with you about offerings, events and news, surveys, special offers, and related topics. You are able to opt-out from marketing communications sent via e-mail at any time, free of charge by using the “unsubscribe” link in any e-mail marketing materials you receive from us, or by contacting us using the contact information listed in this Privacy Statement. Depending on your country of residence, you may also be able to opt out of other types of marketing communications; please contact us using the contact information listed in the Privacy Statement for more information.
- Employment applications. In connection with a job application or inquiry, you may provide us with information about yourself, such as a resume/curriculum vitae, professional references, information about education and job background, and information about professional training and certifications. We and members of our group may use this information for the purpose of employment consideration, and as otherwise set forth in any separate privacy statement or other notice made available to in connection with your application.

- **Research and analysis.** We may use your personal information to conduct research and analysis to help us analyze your purchasing preferences, identify the products and services that best meet your requirements and measure the effectiveness of the advertising we serve you.
- **Enforcement:** We may use the personal information we collect in order to detect, prevent and respond to fraud, intellectual property infringement, violations of our terms and conditions, violations of law or other misuse of our Sites.

Where permitted by law, we may combine the information that we collect via our Sites with other information we hold about you (such as information about your use of our products and services) in order to offer you an improved and consistent customer experience when interacting with us or for other purposes set forth in this Privacy Statement.

3) The legal basis on which we process information

Where required by law, we will ensure there is a legal basis for the processing of your personal information. In most cases the legal basis will be that:

1. the processing is necessary for the performance of the services we provide to you;
 - the processing is necessary to comply with our legal obligations, including compliance with applicable laws, regulations, governmental and quasi-governmental requests, court orders or subpoenas;
 - the processing is based on your consent to the processing of your personal information for one or more specified purposes (e.g. marketing); or
 - the processing is necessary to meet our legitimate interests, for example to develop and improve our Sites, products and/or services for the benefit of our customers.

4) Anonymizing information

In accordance with applicable law, we may anonymize your personal information so that it can no longer be used to identify you. Anonymized information is not considered personal information and is therefore not subject to this Privacy Statement. We may collect, use and share anonymized information for any purpose.

5) How long we keep information

The period during which we store your personal information varies depending on the purpose for the processing. For example, we store personal information needed to provide you with products and services, or to facilitate transactions you have requested, for so long as you are a customer of the Company. We store your personal information for marketing purposes until you have opted out of receiving further direct marketing communications in accordance with applicable law. If you submit an employment application via our Sites, we will retain details of your application as set forth in the privacy statement or other notice made available to you in connection with your application or as otherwise required by law. In all other cases, we store your personal information for as long as is needed to fulfill the purposes outlined in this privacy statement, following which time it is either anonymized (where permitted by applicable law), deleted or destroyed.

6) Disclosure of information

We may share your personal information with selected third parties in accordance with applicable law, including as set out below.

- Our group companies. We may share your personal information with our affiliates and group companies as reasonably necessary for the purposes set out in this Privacy Statement.
- Service providers. We may share your personal information with companies with which we have contracted to provide services on our behalf, such as hosting websites, conducting surveys, processing transactions, analyzing our Sites and performing analyses to improve the quality of our business, Sites, products and services. We require these service providers to protect the confidentiality of your personal information.
- Distributors and other trusted business partners. We may share your personal information with third parties that distribute our products and other trusted business partners for purposes that include allowing those third parties to send marketing communications to you. Such sharing of personal information for marketing purposes will be performed in accordance with applicable laws and regulations.
- Disclosure in connection with transactions. In connection with certain transactions, we may disclose some or all of your personal information to financial institutions, government entities and shipping companies or postal services involved in fulfillment of the transaction.
- Disclosures in connection with acquisitions or divestitures. Circumstances may arise where for strategic or other business reasons the Company decides to sell, buy, divest, merge or otherwise reorganize businesses in some countries. We may disclose information we maintain about you to the extent reasonably necessary to proceed with the negotiation or completion of a merger, acquisition, divestiture or sale of all or a portion of the Company's assets.
- Disclosure for other reasons. We may disclose personal information if required or authorized to do so by law or in the good-faith belief that such action is necessary to comply with legal requirements or with legal process served on us, to protect and defend our rights or property or, in urgent circumstances, to protect the personal safety of any individual.

7) International transfers

We are a global company. By using or accessing our Sites or contacting us and giving your information to us, you acknowledge and agree that your personal information may be collected in, transferred to and accessed by the Company, our group companies, suppliers, distributors and other business partners and/or agents located in countries outside of your country or residence, including, but not limited to, the United States, Mexico and India, in accordance with applicable law. Please be aware that the privacy protections and legal requirements, including the rights of authorities to access your personal information, in some of these countries may not be equivalent to those in your country of residence. However, we will take reasonable steps to protect your privacy and to provide a level of protection of personal information that is comparable to that of your country of residence.

Users Located in the European Economic Area (EEA)

Where required, we have put in place appropriate safeguards with our group companies, service providers, contractors, distributors and other business partners and agents to ensure that transfers of personal information outside the EEA are adequately protected. These safeguards typically comprise the EU Standard Contractual Clauses in accordance with Article 46(2) of the EU General Data Protection Regulation. For more information on the appropriate safeguards in place to protect your personal information, please contact us using the details at the end of this Privacy Statement.

8) Security

We are committed to protecting the security of your personal information. We use a variety of security technologies and procedures to help protect your personal information from unauthorized access, use or disclosure, including implementation of such security measures as may be required by applicable law. However, no information system can be 100% secure, so we cannot guarantee the absolute security of your personal information. Moreover, we are not responsible for the security of information you transmit to the Sites over networks that we do not control, including the Internet and wireless networks.

The safety and security of your personal information also depends on you. Where we have given you (or where you have chosen) a User ID and password to access the Sites, you are responsible for keeping those log-on credentials confidential and not revealing them to others.

9) Cookies and similar technologies; web analytics

What is a cookie?

Cookies are text files containing small amounts of information which are downloaded to your hard disk or to your browser's memory when you visit one of our Sites. Cookies are useful because they help arrange the content and layout of our Sites and allow us to recognize those computers or other devices that have been to our Sites before. Cookies do many different jobs, such as allowing our Sites to remember your preference settings and helping us to enhance the usability and performance of our Sites and your experience using them.

Our Sites also may contain electronic images known as web beacons – sometimes called single-pixel gifs – that allow us to count the number of users who have visited specific pages. We may also include web beacons in promotional e-mail messages or newsletters in order to determine whether messages have been opened and acted upon.

Categories of cookies and similar technologies that we use

The type of cookie or similar technology that may be used on our Sites can be put into 1 of 4 categories: Strictly Necessary, Performance, Functionality & Profile and Advertising.

1. Strictly Necessary Cookies

These cookies are essential for basic functionalities of the Site, and they enable you to move around our Sites and use their features, particularly in connection with information searches and order placement. Without these cookies, services you have asked for cannot be provided. These cookies do not gather information about you that could be used for marketing or remembering where you have been on the internet. Examples of strictly necessary cookies are a shopping basket cookie, which is used to remember the products that you wish to purchase when you add products to your shopping basket or proceed to checkout, a login/ authentication cookie which allows and manages your login to the Site and identifies you after logging in for a single

session, a session cookie which is required to carry out the data transmission and provide the Site to you, a security cookie that detects repeat failed login attempts or similar abuses of the Sites. These types of cookies are regularly stored only as long as required for their purpose.

2. Performance Cookies

These cookies collect information about how you use our Sites, for example which pages you go to most often and if you get any error messages from certain pages. These cookies collect information that is used to improve how our Sites work. Without these cookies we cannot learn how our Sites are performing and make relevant improvements that could better your browsing experience. Examples of performance cookies that our Sites use include cookies from Google and Adobe Analytics (see further discussion below).

3. Functionality & Profile Cookies

These cookies allow our Sites to store information that you provide, such as preferences, and to store technical information useful for your interactions with our Sites. For instance, they remember your user ID and elements of your user profile. They also ensure that your experience using the Sites is relevant to you. They may also be used to provide services you have asked for such as watching a video or commenting on a blog (without being a cookie that is strictly necessary for the Site to function, see category 1). These cookies will not be used to track your browsing activity on other websites.

Without these cookies, a website cannot remember choices you have previously made or personalize your browsing experience. For example, we use a cookie to store your language preferences, which allows us to present you with product search results in the correct language, and we use a cookie to store your choice about the appearance of the cookie information banner that we display on our Sites. This cookie will help us remember your choice about the appearance of the cookie information banner when you subsequently visit the same site where you made your choice about the banner and any other Company sites with the same domain or the same top-level domain.

4. Advertising Cookies and Similar Technologies

These cookies or similar technologies may be used to deliver advertisements that are more relevant to you and your interests. They may also be used to limit the times you see an advertisement as well as help to measure the effectiveness of the advertising campaign. These cookies may track your visits to other websites. Without these cookies or other technologies, online advertisements you encounter will be less relevant to you and your interests.

We permit third-party advertising partners (see below) to use cookies and other technologies to collect information about your browsing activities over time and across different websites when you use our Sites, including products that you browse or purchase and your location. Examples of advertising cookies or similar technologies that we use include Google AdWords and Facebook Pixels.

Setting your cookie preference

You can usually modify your browser settings to decline cookies and you can withdraw your consent at any time by modifying the settings of your browser to reject or disable cookies or by opting out of specific cookies through the opt-out options shared below. If you choose to decline cookies altogether, you may not be able to fully experience the features of the Sites that you visit.

Our use of web analytics

We use industry standard web analytics to track visits to our sites (“Web Analytics Providers”). The information generated by the cookie about your use of our Sites (including your IP address) will be transmitted to and stored by our Web Analytic Providers on their servers. The Web Analytics Providers will use this information for the purpose of evaluating your use of our Sites, compiling reports on website activity for website

operators and providing other services relating to website activity and internet usage (as specified below). The Web Analytics Providers may also transfer this information to third parties where required to do so by law, or where such third parties process the information on their behalf.

We use different analytic tools which serve the purpose of measuring, analyzing and optimizing our marketing measures and provide you with customized advertisements that could be of particular interest to you.

Marketo cookies are used to measure user engagement with our Sites, online events, advertisements and online content such as white paper downloads. The cookie allows linking a user to the recipient of an email marketing campaign to measure campaign effectiveness. The personal data collected may include the following: time of visit, pages visited, referring site details, type of web browser and operating system, interactions on site, network location, IP address, document downloads, clicks on links leading to external websites. We use the feature of IP anonymization in the service provided by Marketo.

10) Do Not Track

Some web browsers may transmit “do-not-track” signals to the Sites with which the user communicates. Because of differences in how web browsers incorporate and activate this feature, it is not always clear whether users intend for these signals to be transmitted, or whether they even are aware of them. We currently do not take action in response to these signals.

11) Your rights

You may have certain rights with respect to personal information about you that is collected through the Sites or when you contact us. If you are a resident of the EEA, the rights described below may apply to you. For other users, the rights that apply to you will depend on the laws of your country of residence. We will facilitate your exercise of the rights that apply to you in accordance with applicable law. For more information about your rights, please contact us using the contact details at the end of this Privacy Statement.

1. Access : You may have the right to access, review and correct personal information collected through our Sites or when you contact us. In some cases, you can do this by going to the page on which you provided the information. You can help us to maintain the accuracy of your information by notifying us of any change to your mailing address, phone number or e-mail address.

- Object : YOU MAY BE ENTITLED TO OBJECT TO CERTAIN TYPES OF PROCESSING ACTIVITIES INVOLVING YOUR PERSONAL INFORMATION, INCLUDING WHERE WE ARE RELYING ON A LEGITIMATE INTEREST TO PROCESS YOUR PERSONAL INFORMATION OR WHERE WE ARE PROCESSING YOUR PERSONAL INFORMATION FOR DIRECT MARKETING. IN SOME CASES, WE MAY DEMONSTRATE THAT WE HAVE COMPELLING LEGITIMATE GROUNDS TO CONTINUE TO PROCESS YOUR PERSONAL INFORMATION IN WHICH CASE WE ARE NOT OBLIGED TO COMPLY WITH YOUR REQUEST.
- Erasure : You may be entitled to request the erasure of your personal information, for example, where the information is no longer necessary for the purposes for which they were collected.
- Restriction : You may be entitled to request that we restrict our processing of your personal information, for example, where the accuracy of the information is contested by you.
- Data portability : You may be entitled to receive and reuse your personal information for your own purposes. This is known as the right to data portability and, where applicable, requires us to move,

copy or transfer your personal information from our systems to you or (where technically feasible) a third party chosen by you without affecting its usability.

- **Consent:** If you have provided your consent to the processing of your personal information, you may have the right to withdraw your consent at any time by contacting us using the contact details at the end of this Privacy Statement or, in the case of email marketing, by using the “unsubscribe” link in any of our marketing emails. This won’t affect the lawfulness of any processing up to that point.

We will respond to any requests from you to exercise your rights within the timeframes required by law. We may charge a fee to facilitate your request where permitted by law. To exercise any of your rights, please contact us using the contact details set out at the end of this Privacy Statement. We may take steps to verify your identity before taking action on a request. If you believe our processing of your personal information does not comply with data protection law, you can make a complaint to the supervisory authority in charge of overseeing compliance with data protection law in your jurisdiction. We would however appreciate the chance to address your concerns, so please feel free to contact us regarding any complaint you may have.

12) Children’s information

We do not knowingly collect information from children and do not target or direct our Sites to children. The meaning of “children” is subject to the laws and regulations in the jurisdiction in which you are located.

13) Links to other websites

Our Sites may contain links to third-party websites, products and services. We have no liability or responsibility for those websites, products and services, their policies, or their collection or other processing of your personal information. The practices of those third parties with respect to information collected through their websites, products or services is governed by their own privacy policies. We encourage you to learn about the privacy policies of those third parties.

14) Contact us

If you have questions regarding this Privacy Statement or our handling of your personal information, would like to lodge a complaint, or wish to contact our Data Protection Officer, please contact us using the contact information listed below. We will promptly address your concern and strive to reach a satisfactory resolution.

Email:

Attn: Chief Privacy Officer

Privacy@minnesotaadvisorygroup.com

15) Changes to this Privacy Statement

We may occasionally update this Privacy Statement. When we do, we will revise the “last updated” date at the top and bottom of the Privacy Statement and take such additional steps as may be required by law.

Last updated August 7, 2019