

PRIVACY NOTICE

This privacy notice ("**Notice**") explains how Eton Solutions, L.P. or any of its affiliates or subsidiaries ("**we, us, our**") Processes Personal Data collected from individuals ("**your, you**"). We shall act as the Controller only for Personal Data collected under clause 2 of this Notice. For any other Processing of your Personal Data including Processing under Section 3, we will only act as a Processor of Personal Data and such Processing will be governed by the terms and conditions of the agreement between you and your bank, family office or data aggregator. Your data privacy questions and requests should be submitted to their respective to your bank, family office or data aggregator in its capacity of a Controller of your Personal Data. We are not responsible for the bank or family office, or data aggregator's privacy or security practices which may be different from this Notice.

1. Definitions

- 1.1. "**AtlasFive**" shall mean AtlasFive® application which includes its tenant portal, client portal, admin portal and mobile app which is offered by us to you.
- 1.2. "**Administrative Family Office**" shall mean a service we provide where we act as the family office for our clients.
- 1.3. "**Controller**" means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.
- 1.4. "**Personal Data**" means any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- 1.5. "**Platform**" means AtlasFive and Website(s).
- 1.6. "**Process/Processing/Processed**" means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

1.7. **“Processor”** means a natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller.

1.8. **“Website(s)”** shall mean <https://eton-solutions.com/> and any other websites owned and operated by us.

2. Personal Data we collect about you as a Controller and how we use it:

2.1. Where you are a Website(s) visitor, we collect the following:

- i. First name and last name – When you submit a form on our Website(s) or reach out to us for any query.
- ii. Email address – when you wish to schedule a demo with us or when you submit a form on our Website(s) or when you reach out to us for any query or when we need to notify you about our updated Notice.
- iii. Company Name - when you submit a form on our Website(s) or reach out to us for any query.
- iv. Location - When you submit a form on our Website(s).
- v. Information about your equipment, your IP address, browsing actions and patterns – When you navigate and interact on the Website(s), we automatically collect traffic data through cookies. To learn more, please visit our [cookie policy](#).

2.2. Where we are an Administrative Family Office, and you are an AtlasFive user, we act as a Controller and Process the following Personal Data:

Account Name	Custodian Contact Name	Tax Details
Account Number	Custodian Name	Taxpayer ID
Your Address	Date of Birth	Valuation Report
Advisor name	Date of Death	Vendor Name
Asset Details	Entity Name	Vendor Payment details
Custodian Contact Email	Liability details	

In addition to the list, the following documents may be processed & stored in AtlasFive® only if the family members share these details.

Account List	Health Care Proxy	Power of Attorney
Biography	Income statements	Prenuptial Agreement
Death Certificate	Financial Statements	Property documents

Driving License	Investment Due Diligence Documents of Fund Manager and 3rd Parties	Retirement Benefits
Family Tree	Loan details	Tax Statements
Global Entry Information	Living Will	
Green Card	Membership Certificates	

2.3. When you are an applicant applying for a position with us, we collect your first name, last name, email address, address, city, province, postal code, the country you live in and any other Personal Data in your resume. Additionally, we may also collect your website, blog or portfolio details and your LinkedIn profile details when you update the non-mandatory fields that you share it with us.

2.4. We may also use the information you provide in any other manner that we describe and for any other purpose with your consent.

2.5. If we process any transaction on AtlasFive, we may collect your Personal Data, including credit card numbers, security codes and other financial information.

2.6. We may also Process your Personal Data to carry out our legal obligations and enforce our rights arising from any contracts entered between you and us, including for billing and collection.

2.7. We may also receive your Personal Data indirectly from third party sources like marketing lists, databases and social media but only where we have checked that these third parties either have your consent or are otherwise legally permitted or required to disclose your Personal Data with us.

2.8. The Website(s) includes social media features and widgets that are hosted by a third-party and your interaction with these social media features and widgets are governed by the privacy notice of such third-party. You should check your privacy settings with those third-party and change the information sent to us through these services. We may also collect Personal Data from third party service providers who assist us with functions such as receiving jobs applications.

3. Personal Data we collect about you as a Processor:

3.1. We collect Personal Data from you in our capacity as a Processor, only when such Personal Data is collected through AtlasFive for us to perform our contract with you. The Personal Data includes:

Account Name	Custodian Contact Name	Tax Details
Account Number	Custodian Name	Taxpayer ID
Your Address	Date of Birth	Valuation Report
Advisor name	Date of Death	Vendor Name
Asset Details	Entity Name	Vendor Payment details
Custodian Contact Email	Liability details	

In addition to the list, the following documents may be processed & stored in AtlasFive® only if the family office shares these details.

Account List	Health Care Proxy	Power of Attorney
Biography	Income statements	Prenuptial Agreement
Death Certificate	Financial Statements	Property documents
Driving License	Investment Due Diligence Documents of Fund Manager and 3rd Parties	Retirement Benefits
Family Tree	Loan details	Tax Statements
Global Entry Information	Living Will	
Green Card details	Membership Certificates	

4. Disclosure of Personal Data

- 4.1. We may disclose your Personal Data for any permitted marketing and promotions in accordance with applicable laws.
- 4.2. If we intend to transfer Personal Data internationally, we shall inform you of our lawful purposes for such intended international transfers.
- 4.3. We may disclose your Personal Data to our subsidiaries and affiliates and to any contractors, service providers and other third parties who need to know such Personal Data to provide services that we request for supporting our permitted uses of Personal Data.
- 4.4. We may disclose your Personal Data to a buyer or other successor of our business in the event of a sale of equity or assets, reorganization, merger or a similar corporate transaction and any due diligence review with respect to such proposed transaction.
- 4.5. We may also disclose your Personal Data to comply with any court order, law or legal process, including to meet national security and law enforcement requirements and to respond to any government or regulatory request or audit and to enforce or apply our terms of use, including for billing and collection purposes, or if we believe disclosure is

necessary or appropriate to protect the rights, property, or safety of our customers or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

5. Retention of Personal Data

We will only retain your Personal Data as long as it is necessary for legal, regulatory and business requirements. We maintain specific records management and retention policies and procedures, so that personal data are deleted after a reasonable time according to the retention criteria.

6. International Transfers of Personal Data

- 6.1. AtlasFive is hosted in multiple countries, and you may choose the location for your data to be hosted in. Our Services may be provided from any of our centers, each of which will comply with standards governing information security & data protection. Our services are fully compliant with applicable data residency rules.
- 6.2. It is possible that certain information will be stored on servers in multiple other countries on the “cloud” or other similar distributed hosting platforms. If you are accessing AtlasFive from jurisdictions other than where it is hosted, the laws governing personal data collection, use and disclosure differ from AtlasFive hosted country, leading to transfer of Personal Data outside your home jurisdiction. By providing your Personal Data to us, you are consenting to the transfer of your Personal Data between AtlasFive hosted country and other jurisdictions as indicated above, and to our use and disclosure of your Personal Data in accordance with this Notice.
- 6.3. If your Personal Data is collected on the Website(s), we Process it in the United States of America. However, we may transfer such Personal Data outside these geographies for the purposes referred to in Section 2 of this Notice.
- 6.4. When your Personal Data is transferred to our affiliates, subsidiaries or a third party outside such geographies, the transfer is carried out under organizational and contractual measures to ensure compliance with applicable data protection regulations to safeguard your personal data.

7. Your Rights

- 7.1. You may request us for access, correction, deletion and erasure of your Personal Data.

- 7.2. Where we have collected and Processed your Personal Data with your consent, you may withdraw such consent at any time. Withdrawing your consent will not affect the lawfulness of any Processing we have conducted prior to your withdrawal, nor will it affect Processing of your Personal Data conducted in reliance on lawful Processing grounds other than consent.
- 7.3. If you are not satisfied with our response, or believe we are not Processing your Personal Data in accordance with legal requirements, you may lodge a complaint with a data protection authority about our collection and use of your Personal Data.
- 7.4. You have the right to opt-out of marketing communications we send you at any time. You can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing emails we send you. To opt-out of other forms of marketing (such as postal marketing or telemarketing), please contact us.
- 7.5. You can object to the Processing of your Personal Data, ask us to restrict Processing of your Personal Data or request portability of your Personal Data.
- 7.6. If you are a resident of California, you also have the following rights:
- 7.6.1. You have the right to opt-out of from sale of your Personal Data.
 - 7.6.2. You have the right to request a list of the categories of Personal Data that we have disclosed to third parties in the preceding calendar year.
 - 7.6.3. You also have a right to not receive discriminatory treatment for exercising your rights.
 - 7.6.4. You have the right to limit the use and disclosure of your Personal Data.

You can reach out to us though the contact information set out in Section 11 of this Notice for raising a request in relation to the abovementioned rights.

8. Security of Personal Data

We use appropriate technical and organizational measures to protect the Personal Data that we collect and Process. The measures we use are designed to provide a level of security appropriate to the risk of Processing your Personal Data. If you have questions about the security of your Personal Data, please contact us immediately as described in

this Notice.

9. Children under the age of 16

Platform is not intended for children under 16 years of age, and no one under age 16 shall provide any information on Platform. We will not knowingly collect your Personal Data from children under age 16. If you are under 16 of age, do not use or provide any data on this Platform or make any purchases through this Platform or use any of the interactive or public comment features of this Platform, or provide any Personal Data about yourself to us, including your name, address, telephone number, email address, or any screen name or username you may use. If we learn to have collected or received any Personal Data from a child under 16 years of age without verification of parental consent, we will delete that data. If you believe we might have any information from or about a child under the age of 16, please contact us at privacy@eton-solutions.com.

10. Changes to the Notice

We keep this Notice under regular review and may update this Notice at any time. This Notice may be amended at any time, and you shall be notified only if there are material changes to this Notice. The latest updated versions of this Notice shall prevail over the earlier versions of the Notice.

11. Contact Information

To ask questions or comment about this Notice and our privacy practices, contact our data protection officer:

Kind Attention: Amarnath J Shenoy

Email Address: privacy@eton-solutions.com

Address: 2250 Perimeter Park Dr., Suite 150
Morrisville, NC 27560

Tel: +1 844 630 0525 (USA)

Tel: +91 080 45219300

Last updated: 31st July 2023