



Axiom Privacy Policy

Dated: May 1, 2018

Axiom (a Gentech, LLC proprietary software package ("Gentech")) appreciates your concerns about the privacy of personal information that you provide to us through this website ("Site"). Accordingly, we have posted this Online Privacy Statement to explain how we handle such information.

Applicability

If you do not agree to the terms of this Online Privacy Statement, please do not provide us with any information and do not use the Site. By using the Site and voluntarily providing your personally identifiable information to us, you consent to the collection and use of such personally identifiable information as set forth in this Online Privacy Statement.

This Online Privacy Statement applies to this Site. Our online products and services may have different Online Privacy Statements. To view the Online Privacy Statement for specific products and services please click on the Privacy link on that site.

Modifications

We may modify this Online Privacy Statement at any time so please check from time to time for such modifications. If you have specific questions regarding this Online Privacy Statement or any information you have sent via the Site, please do not hesitate to contact us.

Collection and Use of Your Information (including via Cookies)

We use cookies, web beacons and similar technologies (called "Cookies" in this Online Privacy Statement) to track information provided to us by your browser and by our software application when you use the Site. A cookie is a small piece of information that a website stores on the web browser on your device and can later retrieve. "Session" Cookies are temporary and will expire at the end of a browser session; that is, when you leave a website. Session Cookies allow a website to recognize you and carry information as you navigate between pages during a single browser session and allow you to use the website most efficiently. "Persistent" Cookies, in contrast, remain in the Cookie file of your browser even after you leave a website and after the browser is closed. They enable a website to recognize you on your return, remember your preferences and provide tailored services to you. A cookie will not contain information that will enable us to contact you via telephone, e-mail, or other means.

We, and third-party service providers acting on our behalf, use session and persistent Cookies to:

- Remember preferences that you submit as well as those generated from your usage data, your confirmation of being an institutional investor or consultant in the United States, and your responses to polls and surveys on our Site;
- Measure your use of our Site in an effort to improve its quality and enhance your overall experience, including tracking page views, time and date of Site access, and other usage data, and identifying your operating system and browser type (but not other information about your computer or the programs on it) and your general geographic location.

Most browsers are initially set to accept Cookies. However, you have the ability to change your browser settings. It may also be possible to configure your browser settings to enable acceptance of specific Cookies or to notify you each time a new Cookie is about to be stored on your device enabling you to decide whether to accept or reject the Cookie. You can also disable Cookies by configuring your browser setting to reject Cookies. Please refer to the help section of your browser for instructions on disabling Cookies. For more information about Cookies, how they work, why they are so useful and how to disable them, you can visit www.allaboutcookies.org.

If you do not wish to accept Cookies from this Site, please either disable them or refrain from using this Site. If Cookies are disabled, it may mean that you experience reduced functionality or will be prevented from using all or part of this Site.

We may use aggregated usage data to track trends and analyze patterns on the Site. You may also voluntarily submit information, including by responding to our online polls and surveys, requesting information from us or asking to be contacted by one of our representatives. If you work for one of our institutional (business) clients, we may obtain your business contact information from your firm. If you register to enter an area of this Site, the Site will recognize who you are and collect all information that you submit (including subscription to emails, etc.). Any information collected about you from this Site may be associated with other identifying information that we have about you.

In addition to the above uses, we may use your information for the purpose of conducting business with you, managing our relationship with you, and advising you of products and services that we believe might be of interest. The information collected also is used to provide a record of communications between Axiom/Gentech, and its Site visitors and to comply with any applicable legal and/or regulatory requirements.

Sharing of Your Information

We do not sell or rent your personally identifiable information to third parties. We share your information only with to comply with all applicable laws, regulations and rules, and requests of law enforcement, regulatory and other governmental agencies.

If you, as a customer, have contracted to receive investment solutions from Portfolio Design Advisors, LLC ("PDA"), Axiom/Gentech will share your information with PDA.

Third Party Sites

This Site may contain links to third party sites (including social media bookmarking buttons that enable you to share certain content on our Site). Please review the cookie and privacy statements of these third-party sites to understand how they may use Cookies and your information. Our Online Privacy Statement does not apply to your use of a third-party site.

Security of Personal Information

We utilize reasonable security technologies to protect sensitive information. However, the security of this information depends in part on the security of the computer you use to communicate with us, the security you use to protect User IDs and passwords, and the security provided by your internet access services provider. We are not responsible for the security of your internet access services provider; you should review the security and privacy policies of your internet access services provider carefully. Information that you access via this Site may be stored on your computer during your session for your convenience. If others have access to your computer or your User ID and password, they may be able to access this information. We are not responsible for the security or privacy of information communicated to or from such a computer. Finally, you should keep any correspondence you receive relating to this Site or the Services (including, but not limited to registration information, emails, or any other information) confidential and in a safe place.

Notice to California Users Required by State Law

We collect, use, retain and share information we receive through this Site in accordance with the above section entitled "*Collection and Use of Your Information*". For information about whether third parties may collect personal information about your online activities over time and across other websites when you use this Site, please see the above sections entitled "*Collection and Use of Your Information*" and "*Third Party Advertisers*". This Site currently does not respond to "do not track" signals or similar mechanisms.

If you have specific questions regarding this Online Privacy Statement or any information you have sent via this Site, please do not hesitate to contact us.

This Online Privacy Statement was last updated on the date listed at the top.