

Privacy Policy Notice

1. General

This privacy policy (“**Privacy Policy**”) explains how Dunn Capital Management, LLC (“DCM”) may collect and process information about you. Please read it carefully to understand our views and practices regarding your personal data and how we collect and process it.

By submitting personal data to DCM (referred to as “we”, “us” or “our” in this Privacy Policy), you agree to us collecting and processing your personal data as set out in this Privacy Policy.

We keep our Privacy Policy under regular review and may amend it from time to time, so please review it carefully and periodically to keep informed of any changes. Your use of our website www.dunncapital.com (“**DCM Website**”) constitutes your acceptance to the terms of this Privacy Policy as revised by us and applicable from time to time.

2. Information we collect from you and how we process it

We may collect and process the following personal data about you:

- Information you provide by filling in forms on the DCM Website. This includes personal data that you provide to us through an on-line form on the DCM Website.
 - the subscription document you submitted at the time of your initial investment with DUNN.
 - records of your transactions with us.
- If you contact us, we may keep records of such correspondence or oral communications.
- Surveys for research purposes, although you do not have to respond to them.
- Details of your visits to our website, including but not limited to:
 - Communication through email, or any other form of communication to us. We may process this data for the purposes of communicating with you and for record keeping.
 - Data about how you use our website. We may process this data to operate our website and ensure relevant content is provided to you and for the security of our website.
 - Technical data about your use of our website such as your IP address, any login data, details about your browser, length of visit to pages on our website, page views and navigation paths, details about the number of times you use our website, time zone settings and other technology on the devices you use to access our website. The source of this data is from analytics tracking systems. We may process this data to analyze your use of our website, to administer and protect our business and website, to deliver relevant website content and advertisements to you and to understand the effectiveness of our

advertising.

- Data about your preferences in receiving marketing from us and our third parties and your communication preferences. We may process this data to enable you to participate in our promotions such as free guides, books, podcasts and other content, to deliver relevant website content and advertisements to you and measure or understand the effectiveness of this advertising.

In addition, we may collect and process your personal data and information about you to:

- Send you our newsletters and news alerts, updates and other marketing materials from time to time. You can unsubscribe and any time by clicking the Unsubscribe link in the footer of every email you receive from us.
- To perform any contract with you or in order to comply with a legal obligation.
- Ensure that content from our website is presented in the most effective manner for you.
- Provide you with updated information on products or services including notifying you of changes to our website and services.

3. Cookies

DCM uses cookies to help us improve the DCM Website and to deliver a good experience when you browse. Cookies are small text files that a website transfers to your hard drive or browser to help you navigate through the website faster or for tracking your website usage. For more information about this, please see our [Cookie Policy](#) on page 4.

4. Disclosure of your personal data to third parties

We do not disclose non-public personal information of current and former investors to anyone except as described below, as required by law, and as specifically authorized by you.

- Service providers who have a business to know your data and who provides services to us involving data processing, for example IT and system administration services, our selected marketing automation platforms, banking services, website service providers, social media and security service providers, and you acknowledge that your personal data will be transferred to such third parties for processing and that some of these third party service providers are based outside of the United States and/ or the European Economic Area.
- Professional advisers including lawyers, business consultants and auditors where such disclosure is relevant and/or necessary for DCM.
- Government bodies that require us to report our processing activities.
- Third parties to whom we may in the future sell, transfer, or merge parts of our business or our assets.
- We will disclose your personal data if we are under a legal duty to do so in order to comply with any law or regulation, any legal obligation or pursuant to a court order or Government

body notice or order, or where such disclosure is required in order to enforce the terms of this Privacy Policy or in respect of any legal proceedings involving your personal data.

5. Data Security

We have implemented procedural safeguards in an ongoing effort to protect your personal data, but unfortunately the transmission of information via the internet is not completely secure. You acknowledge that we cannot guarantee the security of your data transmitted to our site or online which is at your own risk.

6. Data Retention

Subject to law, we will only retain your personal data for as long as necessary to fulfill the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements.

7. Access Request

Under certain data protection laws you have right to access, amend or delete your personal data.

If you would like to request a copy of your personal data that we hold, please send us an email at info@dunncapital.com

We will try to respond to all legitimate requests within one month, but it may take longer if your request is particularly complex, in which case we will notify you.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data. This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

8. Third-party links

The DCM Website may include links to third-party websites, plug-ins and applications such as i-Tunes. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy policies or notices. When you leave our website, we encourage you to read the privacy policies or notices of every website you visit.

9. Contact us

If you have any questions about our Privacy Policy please send us an email at info@dunncapital.com.

Cookie Policy

What is a cookie?

A "cookie" is a piece of information that is stored on your computer's hard drive and which records how you move your way around a website so that, when you revisit that website, it can show options based on the information stored about your last visit. Cookies can also be used to analyze traffic and for advertising and marketing purposes.

If you want to check or change what types of cookies you accept, this can usually be altered within your browser settings. You can usually block cookies at any time by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

How does Dunn Capital Management, LLC (“DCM”) use cookies?

- DCM may use cookies to track your use of our website. This enables us to understand how you use the site and track any patterns with regards to how you are using our website. This helps us to develop and improve our website as well as products and / or services.
- Cookies are usually either session cookies that are stored on your computer during your web session and are automatically deleted when you close your browser or persistent cookies that are stored as a file on your computer and it remains there when you close your web browser. The cookie can usually be read by the website that created it when you visit that website again.