

PRIVACY POLICY

Last Updated: [May 07, 2019]

Atlasone (“Atlasone,” “we,” “us,” or “our”) respects your privacy and is committed to protecting the personal information entrusted to us.

This Privacy Policy explains how we collect, use, disclose, store, and protect personal information when you visit our website, use our online platform, create an account, communicate with us, participate in our retirement planning services, explore or participate in real estate opportunities, purchase or develop real estate through our services, or otherwise interact with Atlasone (collectively, the “Services”).

By using the Services, you acknowledge that you have read and understood this Privacy Policy.

1. INFORMATION WE COLLECT

Depending on how you interact with Atlasone, we may collect different categories of personal information.

A. Information You Provide Directly

We may collect information you voluntarily provide to us, including:

- * First and last name;
- * Email address;
- * Telephone number;
- * Mailing and residential address;
- * Date of birth;
- * Account login information;
- * Government-issued identification information;
- * Social Security number or taxpayer identification number where required;
- * Citizenship or residency information;
- * Employment and income information;

- * Financial and investment information;
- * Banking or payment information;
- * Retirement account information;
- * Investment objectives and preferences;
- * Information relating to your investment experience and risk profile;
- * Information contained in applications, questionnaires, forms, agreements, and other documents;
- * Property purchase or ownership information;
- * Communications and correspondence with Atlasone; and
- * Any other information you choose to provide.

Some information may be required to establish an account, verify your identity, determine eligibility, process an investment, comply with legal or regulatory requirements, or complete a real estate transaction.

B. Information Collected Automatically

When you access the Platform, we may automatically collect certain technical and usage information, including:

- * Internet Protocol (“IP”) address;
- * Browser type and version;
- * Device type;
- * Operating system;
- * Unique device identifiers;
- * Pages viewed;
- * Links clicked;
- * Dates and times of access;
- * Time spent on pages;
- * Referring and exit pages;
- * General geographic information;
- * Platform interactions; and
- * Other diagnostic, security, and usage information.

We may combine automatically collected information with information you provide directly.

2. INFORMATION COLLECTED FROM THIRD PARTIES

We may receive information about you from third parties when necessary to provide our Services or comply with applicable requirements.

These sources may include:

- * Financial institutions;
- * Banks and payment providers;
- * Custodians and retirement account providers;
- * Identity verification providers;
- * Compliance and fraud-prevention providers;
- * Credit or background information providers, where legally permitted;
- * Real estate professionals;
- * Property managers;
- * Developers, contractors, and transaction partners;
- * Government agencies and public records;
- * Professional advisers;
- * Service providers; and
- * Other entities involved in an investment or real estate transaction.

Information received from third parties may be combined with information we collect directly from you.

3. HOW WE USE PERSONAL INFORMATION

Atlasone may use personal information for legitimate business, contractual, legal, regulatory, and operational purposes, including to:

- * Provide, operate, maintain, and improve our Services;
- * Create and manage user accounts;
- * Verify your identity;
- * Process applications and transactions;
- * Evaluate eligibility for investment opportunities;
- * Facilitate real estate purchases and transactions;
- * Facilitate investment activities;
- * Support retirement planning services;

- * Process payments and transfers;
- * Communicate with you regarding your account, investments, properties, and transactions;
- * Provide customer support;
- * Provide information about investment and real estate opportunities;
- * Send administrative notices and service communications;
- * Send marketing and promotional communications where permitted by law;
- * Personalize your experience;
- * Analyze Platform usage and performance;
- * Detect and prevent fraud, unauthorized transactions, security incidents, and other unlawful activity;
- * Maintain the security and integrity of the Platform;
- * Conduct audits and internal business operations;
- * Comply with legal, tax, accounting, regulatory, and reporting obligations;
- * Respond to subpoenas, court orders, governmental requests, and other legal processes;
- * Enforce our agreements and policies;
- * Protect Atlasone, our users, and others; and
- * Perform other purposes disclosed to you at the time information is collected or otherwise permitted by law.

4. INVESTMENT AND FINANCIAL INFORMATION

Because Atlasone provides retirement planning and investment-related Services, certain users may provide sensitive financial information.

Depending on the Services you use, this may include information relating to:

- * Income;
- * Assets;
- * Investment experience;
- * Investment objectives;
- * Risk tolerance;
- * Bank accounts;

- * Payment accounts;
- * Retirement accounts;
- * Tax identification;
- * Investment transactions;
- * Property ownership; and
- * Other financial information necessary to provide our Services.

We use this information only for legitimate purposes connected with providing the Services, processing transactions, complying with applicable requirements, preventing fraud, maintaining records, and performing other functions described in this Privacy Policy or disclosed at the time of collection.

5. HOW WE SHARE PERSONAL INFORMATION

We may disclose personal information to third parties when reasonably necessary to operate our business, provide our Services, complete transactions, or comply with legal obligations.

These parties may include:

Service Providers

We may share information with vendors and service providers that perform services on our behalf, such as:

- * Technology providers;
- * Cloud hosting providers;
- * Identity verification services;
- * Payment processors;
- * Banking and financial service providers;
- * Custodians;
- * Accounting and tax service providers;
- * Legal and professional advisers;
- * Customer support providers;
- * Communications providers;
- * Analytics providers;
- * Security and fraud-prevention providers; and

- * Real estate transaction service providers.

These service providers may access personal information only as reasonably necessary to perform services for Atlasone, subject to applicable contractual and legal requirements.

Investment and Real Estate Partners

Where necessary to facilitate an investment, property purchase, development project, financing arrangement, ownership structure, or other transaction, we may share relevant information with parties involved in that transaction.

Legal and Regulatory Disclosures

We may disclose personal information when we believe disclosure is necessary to:

- * Comply with applicable law;
- * Respond to legal process;
- * Respond to governmental or regulatory requests;
- * Enforce our agreements;
- * Protect our rights or property;
- * Prevent fraud or other unlawful activity;
- * Protect the safety of our users, employees, or others; or
- * Protect Atlasone against legal liability.

Business Transfers

If Atlasone is involved in a merger, acquisition, financing, reorganization, sale of assets, bankruptcy, or similar transaction, personal information may be transferred as part of that transaction, subject to applicable law.

6. SALE OR SHARING OF PERSONAL INFORMATION

Atlasone does not sell personal information for monetary consideration in the ordinary course of providing its Services.

However, certain data-sharing activities, particularly those involving advertising, analytics, or targeted marketing technologies, may be considered “sale” or “sharing” under certain state privacy laws even where no money is exchanged.

Where applicable law provides you with a right to opt out of the sale or sharing of your personal information, Atlasone will provide the required mechanism for exercising that right.

7. COOKIES AND TRACKING TECHNOLOGIES

Atlasone may use cookies, pixels, tags, scripts, software development kits, and similar technologies to operate and improve the Platform.

These technologies may allow us to:

- * Keep you signed in;
- * Remember preferences;
- * Understand how users interact with the Platform;
- * Measure website performance;
- * Improve functionality;
- * Detect security issues;
- * Analyze marketing campaigns; and
- * Deliver or measure advertising where permitted.

You may be able to control cookies through your browser or device settings.

Disabling certain cookies may affect the functionality or availability of portions of the Platform.

8. ANALYTICS

We may use third-party analytics services to understand how users interact with our Platform and to improve our Services.

These services may collect information about your device, browser, IP address, pages viewed, interactions, and other usage information.

Where required, we will provide appropriate disclosures and choices concerning analytics technologies.

9. MARKETING COMMUNICATIONS

We may use your contact information to send you information about Atlasone, including:

- * Investment opportunities;
- * Real estate opportunities;
- * Retirement planning resources;
- * Platform updates;
- * Educational materials;
- * Events;
- * Newsletters; and
- * Promotional communications.

You may unsubscribe from marketing emails by using the unsubscribe mechanism included in the communication.

Please note that opting out of marketing communications does not prevent us from sending essential administrative or transactional communications relating to your account, investments, transactions, or legal obligations.

10. PAYMENT INFORMATION

When you make payments or fund an investment through the Platform, your payment information may be processed by third-party payment processors, financial institutions, custodians, banks, or other transaction providers.

Where possible, Atlasone does not directly store complete payment-card information.

The handling of payment information by third-party providers is governed by their applicable terms and privacy policies.

11. DATA SECURITY

Atlasone takes reasonable administrative, technical, and organizational measures designed to protect personal information against unauthorized access, disclosure, alteration, destruction, or misuse.

However, no method of transmission over the Internet or method of electronic storage is completely secure.

Accordingly, while we work to protect personal information, we cannot guarantee absolute security.

The FTC recommends that businesses identify what sensitive information they hold, limit collection to legitimate needs, restrict access, secure stored information, and establish appropriate disposal and incident-response practices. (Federal Trade Commission)

12. DATA RETENTION

We retain personal information for as long as reasonably necessary to:

- * Provide our Services;
- * Maintain your account;
- * Complete and document transactions;
- * Comply with legal, tax, accounting, regulatory, and reporting obligations;
- * Resolve disputes;
- * Enforce agreements;
- * Prevent fraud; and
- * Protect our legal rights.

Retention periods may vary depending on the nature of the information and the purpose for which it was collected.

When personal information is no longer reasonably required, we may delete, anonymize, or securely dispose of it, subject to applicable legal and regulatory requirements.

13. YOUR PRIVACY RIGHTS

Depending on where you live and subject to applicable law, you may have certain rights regarding your personal information.

These rights may include:

- * The right to know what personal information we collect and how it is used;
- * The right to request access to personal information;
- * The right to request correction of inaccurate personal information;
- * The right to request deletion of personal information;
- * The right to opt out of certain sales or sharing of personal information;
- * The right to limit certain uses of sensitive personal information;
- * The right to obtain a copy of certain personal information in a portable format; and
- * The right not to receive discriminatory treatment for exercising applicable privacy rights.

These rights are not absolute and may be subject to exceptions under applicable law.

For example, Atlasone may be required to retain certain information to comply with legal, regulatory, tax, accounting, fraud-prevention, or transaction-related obligations.

14. CALIFORNIA PRIVACY RIGHTS

If you are a California resident and applicable California privacy law applies to your information, you may have additional privacy rights.

The California Consumer Privacy Act, as amended, provides qualifying consumers with rights concerning their personal information, including rights to know, delete, correct, opt out of certain sale or sharing, limit certain uses of sensitive personal information, and receive equal treatment when exercising privacy rights. (California Attorney General)

California residents may submit a privacy request by contacting Atlasone using the information provided in the “Contact Us” section below.

We may need to verify your identity before completing certain requests. The verification process may require information sufficient to reasonably confirm that you are the person about whom we collected personal information.

You may designate an authorized agent to submit certain requests on your behalf where permitted by applicable law.

15. STATE PRIVACY RIGHTS

Other U.S. states may provide residents with privacy rights that differ from those described above.

Where applicable, Atlasone will honor rights required by the privacy laws that apply to the relevant individual and information.

Additional state-specific notices or disclosures may be provided where required.

16. FINANCIAL PRIVACY

Because Atlasone may provide investment and retirement-related services, certain federal and state financial privacy laws may apply to the information we collect and disclose.

Where applicable, Atlasone may provide additional privacy notices concerning financial information and the collection, use, disclosure, and safeguarding of nonpublic personal information.

Where another privacy notice specifically governs financial information or a particular Atlasone service, that notice will apply to the extent of any conflict.

17. CHILDREN'S PRIVACY

The Platform is not intended for individuals under the age of 18.

We do not knowingly collect personal information from children under 18.

If we learn that we have collected personal information from an individual under 18 without appropriate authorization, we will take reasonable steps to delete the information, subject to applicable legal requirements.

If you believe that a child has provided personal information to Atlasone, please contact us.

18. THIRD-PARTY WEBSITES AND SERVICES

The Platform may contain links to third-party websites, applications, financial institutions, payment services, real estate providers, or other services.

Atlasone does not control the privacy practices of third parties.

If you access a third-party website or service, its privacy policy and terms will govern your interaction with that service.

We encourage you to review the privacy policies of third parties before providing them with personal information.

19. INTERNATIONAL DATA TRANSFERS

Atlasone primarily operates in the United States.

Depending on our service providers and technical infrastructure, personal information may be processed or stored in jurisdictions other than the jurisdiction in which you reside.

Where required by applicable law, we will implement appropriate safeguards for such transfers.

20. DO NOT TRACK

Some web browsers offer a “Do Not Track” (“DNT”) setting.

Because there is currently no universally accepted standard for responding to DNT signals across all technologies and services, Atlasone may not respond to DNT signals in every circumstance.

Where applicable law requires recognition of browser-based or device-based privacy signals, Atlasone will honor those signals as required.

21. ACCOUNT AND COMMUNICATION SECURITY

If you create an Atlasone account, you are responsible for maintaining the confidentiality of your login credentials.

You should notify us immediately if you believe that your account has been accessed without authorization.

Atlasone will never intentionally request your password through an unsolicited email or communication.

22. CHANGES TO THIS PRIVACY POLICY

We may update this Privacy Policy from time to time to reflect changes in our Services, business practices, technology, or applicable law.

When we make changes, we will update the “Effective Date” or “Last Updated” date at the top of this Privacy Policy.

Where required by law, we will provide additional notice or obtain consent before material changes become effective.

We encourage you to review this Privacy Policy periodically.

23. CONTACT US

If you have questions about this Privacy Policy, wish to exercise an applicable privacy right, or have concerns about how Atlasone handles personal information, please contact us:

Atlas One Partners Inc.

privatecall@atlasonepartnersinc.com

For privacy requests, please include sufficient information for us to understand and process your request. We may request additional information to verify your identity where permitted or required by law.

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