

PRIVACY POLICY

BLAZE PORTFOLIO SYSTEMS

Effective Date: September 30, 2018

This Privacy Policy describes the types of information Blaze Portfolio Systems, LLC (“Blaze”) collects from and about you when you use the online services accessible through a Blaze-assigned URL (the “Services”). This Privacy Policy also explains how Blaze may use and disclose such information, as well as your ability to control certain uses of it.

By using the Services, you agree to the collection, use, and disclosure of your information as described in this Privacy Policy, and agree to the Blaze Terms of Use, which are incorporated by reference. If you do not agree, please do not access or use the Services.

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1. INFORMATION WE COLLECT

There are several ways we may obtain information about you, including through (A) information you provide to us directly; (B) information that we automatically collect; and (C) information we receive from third parties. This includes data that identifies you personally whether directly (*i.e.*, your name) or indirectly (*i.e.*, information about your use of the Services).

A. Information You Provide

Blaze collects information from you when you choose to share it with us. This may include when you use our Services, register or create an account with or through the Services, request information, opt in to additional security measures, request customer support, import information from a third party, enter notes or information into the Services, or otherwise communicate with or contact us. The information we collect may include your name, address, email address, telephone or mobile number, screen or user name, payment information, third-party platform log-in, and financial account information.

B. Information Automatically Collected

Whenever you visit or interact with the Services, we, as well as any service providers, may use a variety of technologies such as cookies, log files, HTML5 cookies, or other technologies to automatically or passively collect certain information about your online activity.

Please note that we automatically collect the following information about you:

- **Internet Activity.** We may automatically collect your Internet Protocol (“IP”) address or other unique identifier or information from the computer, mobile device, tablet or other device you use to access the Services, including but not limited to any third party platform information, your software version, and the domain name from which you accessed the Services.
- **Network Activity.** We may collect information about your use of the Services, including the date and time you visit the Services, the areas or pages of the Services that you visit, the amount of time you spend viewing or using the Services, the number of times you return to the Services, other click-stream or Services usage data, and other Services that you may visit.
- **Internet or Network Activity Information From Third Party Service Providers.** We may use third party service providers to support our Services. Some of these service providers may use technology such as cookies, web beacons, pixel tags, log files, Flash cookies, or HTML5 cookies to receive, collect, and store information.
- **Internet or Network Activity Information Through Use of Third Party Analytic Technologies.** We may use third parties’ analytics and tracking tools, such as Google Analytics, to better understand who is using the Services, how people are using the Services, and how to improve the effectiveness of the Services and related content. These tools may use technology such as cookies, web beacons, pixel tags, log files, Flash cookies, HTML5 cookies, or other technologies to automatically collect and store certain information. They may also combine information they collect from your interaction with the Services with information they collect from other sources. We do not have access to, or control over, these third parties’ use of cookies or other tracking technologies.

To learn more about your advertising choices relating to the collection and use of your information, please see the [“Your Choices and Opt-Outs”](#) section below

C. Information Collected From Other Sources

We may acquire information from other sources as follows:

- From other trusted third-party sources to update or supplement the information that you provide or that we collect automatically. This includes, for example, information from a third-party system or custodian bank, which may be used to update your financial account information.
- From our partners and service providers (including, for example, business partners, analytics vendors, and hosting partners).

We may use this information to help us maintain the accuracy of the information we collect, personalize your experience with the Services, target our communications so that we can inform you of products, services or other offers that may be of interest to you, and for internal business analysis or other business purposes.

D. Combination of Information

We may combine the information we receive from and about you, including information you provide to us and information we automatically collect through our Services, and from the third party sources described above.

2. INFORMATION USE

Use by or for Blaze

Blaze may use the information we collect from and about you for any of the following purposes:

- To respond to your inquiries, fulfill consumer requests, and contact and communicate with you when necessary;
- To enhance your user experience, including as a way to recognize you and welcome you to the Services;
- To review the usage and operations of our Services, develop new products or services, and conduct analysis to enhance or improve our content, products, and services;
- To provide you with customized content on the Services;
- To use your data in an aggregated non-specific format for analytical and demographic purposes;
- To address problems with the Services or our business, and to protect the security or integrity of the Services and our business; and
- For other purposes disclosed at the time you provide your information or otherwise with your consent.

Additionally, if you use the Services to connect with third party services you authorize us to use information from and about you, on your behalf, to interact with these third party services based on your requests.

3. INFORMATION WE SHARE WITH OTHERS

We may share your personal information with the following:

- **Service Providers:** We may share your information with third party service providers that provide business, professional or technical support functions for us (including to the extent necessary or desirable to complete consumer service requests), help us operate our business and the Services, or administer activities on our behalf.
- **Legal Matters; Safety:** We may access and disclose your information to respond to subpoenas, judicial processes, or government requests and investigations, or in connection with an investigation on matters related to public safety, as permitted by law, or otherwise as required by law. We may disclose your information to protect the security of our Services, servers, network systems, and databases. We also may disclose your information as necessary, if we believe that there has been a violation of our Terms of Use, any other legal document or contract related to our services, or the rights of any third party.
- **Sale or Transfer of Business or Assets:** We may sell or purchase assets during the normal course of our business. If another entity acquires us or any of our assets, information we have collected about you may be transferred to such entity. In addition, if any bankruptcy or reorganization proceeding is brought by or against us, such information may be considered an asset of ours and may be sold or transferred to third parties. Should such a sale or transfer occur, we will use reasonable efforts to try to require that the transferee use personal information provided through this Services in a manner that is consistent with this Privacy Policy.
- **Other:** We also may share your information as disclosed to you at the time of collection.

4. YOUR CHOICES AND OPT-OUTS

A. Cookies, Tracking Options and California Do Not Track Disclosures

Certain parts of our Services require cookies. You may adjust your device or Internet browser settings to limit certain tracking or to decline cookies, but by doing so, you may not be able to use certain features of the Services. Please refer to your device's settings or your Internet browser's "Help" section for more information on how to delete and/or disable your device or browser from receiving cookies or controlling your tracking preferences.

Our system does not recognize Do Not Track requests or headers from some or all browsers.

B. Updating Your Information

If you wish to verify, correct, or update your name, email address, mobile phone number, or username you may do so directly through the Services on the User Management screen, or otherwise contact us at the address or e-mail in the “Contact Us” section below. If you choose to deactivate your account, we may still retain certain information for analytical purposes and recordkeeping integrity, as well as to prevent fraud, resolve disputes, enforce our Terms of Use or other policies, take actions we deem necessary due to technical and legal requirements, and as dictated by constraints related to the security, integrity and operation of our Services.

5. DATA SECURITY

We have taken certain physical, administrative, and technical steps to safeguard the information we collect from and about our customers and Services visitors. While we make every effort to help ensure the integrity and security of our network and systems, we cannot guarantee our security measures.

6. DATA STORAGE

Your personal information may be stored on servers in the United States and is subject to the laws of the United States, where the data protection and other laws may differ from those of other countries. Your personal information may be disclosed in response to inquiries or requests from government authorities or to respond to judicial process.

7. REVISIONS TO THIS PRIVACY POLICY

We reserve the right, at our sole discretion, to change, modify, add, remove, or otherwise revise portions of this Privacy Policy at any time. When we do, we will post the change(s) on the Services. Your continued use of the Services following the posting of changes to these terms means you accept these changes. If we change the Privacy Policy in a material way, we will provide appropriate notice to you.

8. HOW TO CONTACT US

If you have any questions or concerns about this Privacy Policy or the practices described herein, you may contact us at support@blazeportfolio.com or by mail to:

Blaze Portfolio Systems, LLC
4619 N. Ravenswood Ave, STE 302C, Chicago, IL, 60640
Attention: Support