

## **KENNEDYCAPITAL.COM PRIVACY POLICY**

Last Updated on April 1, 2018

The KENNEDYCAPITAL.COM web site (the "Site") is a service of Kennedy Capital Management, Inc. ("Kennedy Capital", "us" or "we"). This Privacy Policy applies only to information that we collect from users of the Site.

WE MAY REVISE THIS PRIVACY POLICY AT ANY TIME. WHEN WE DO, WE WILL ALSO REVISE THE "LAST UPDATED" DATE AT THE TOP OF THIS PRIVACY POLICY. YOU ARE RESPONSIBLE FOR REGULARLY REVIEWING THE CURRENT PRIVACY POLICY. THE MOST CURRENT VERSION OF THE PRIVACY POLICY CAN BE REVIEWED BY CLICKING ON THE "WEB PRIVACY POLICY" HYPERTEXT LINK LOCATED ON OUR WEB PAGES. YOUR CONTINUED USE OF THE SITE AFTER WE POST ANY REVISIONS CONSTITUTES YOUR AGREEMENT TO ANY SUCH REVISIONS.

### **What information does Kennedy Capital collect from this Site?**

We may collect certain information automatically each time you visit the Site. This may include, without limitation, your geographic location, the type of device you use (e.g., desktop, mobile or tablet), the web browser you use, your preferred language settings, and information about your browsing activity (e.g., pages viewed, when such pages were viewed, the duration of each visit, etc.).

Also, each time you visit the Site, our web server may automatically recognize (where possible) and collect your IP address, which is a number assigned to your computer when you connect to the Internet. We may use this information in the aggregate or combine it with other information that we that we or third parties have collected about you (including personally identifiable information) and/or information that is publicly available.

We or our service providers may also use "cookies" and "web beacons." A "cookie" is a small amount of data that is sent to your browser from a web server and stored on your computer's hard drive. Among other things, cookies provide a means for web sites that you visit to keep track of your online patterns and preferences. A cookie will not allow a web site to learn any personally identifiable information (such as your real name and address) that you have not otherwise disclosed. "Web beacons," also known as clear GIFs or single-pixel GIFs, are small image files that we may place on web pages and within web-based email newsletters that we send. Working in conjunction with cookies, web beacons allow us to accurately count the number of unique users who have visited a specific page and the number of times those pages are displayed. We can also use web beacons to let us know how many people opened a web-based email newsletter.

We also collect personally identifiable information that you provide to us directly through the Site. Personally identifiable information is information that tells us who you are such as your name and your e-mail address. We may collect this information when you utilize forms on the website to contact us or send emails to us, register to use this Site, apply for employment or internships, and when you update and/or modify your registration information.

We may also collect other information (e.g., personal, demographic and aggregate information) about you from third-party sources and engage third parties to collect such information for us.

## **Does Kennedy Capital use third parties to gather information?**

Yes, a third party service provider may collect personally identifiable information and/or use cookies or other technology to automatically collect information, and provide that information to us. Such information will be subject to our privacy policy but may also be subject to the third party's own privacy policies.

For example, we may use cookies (as discussed above) through Google Analytics. **For more information on collection and processing of data through Google Analytics, please see [www.google.com/policies/privacy/partners](http://www.google.com/policies/privacy/partners).**

We may also use third parties to automatically collect information (e.g., IP addresses) and associate it with other information available to the third party.

## **How does Kennedy Capital use the information that it collects?**

We may use automatically collected information for various purposes, including the other purposes describes in this Privacy Policy, and for the following purposes: to learn about the visitors to our Site, to customize your experience while visiting the Site, to evaluate and improve the design of the Site, for marketing purposes, and to offer content (including advertisements) that may be of interest to you. We and our third party service providers may combine this information with information that we (or they) already have collected about you (including personally identifiable information) and/or information that is publicly available.

We use personally identifiable information for the purpose for which it was provided to us and for other purposes described in this policy. For example, we may use personally identifiable information that you submit to create your online account, communicate with you about the Site, our company or our services, respond to e-mails, provide customer support and other similar matters.

We may use non-personally identifiable aggregate information to help us run and maintain the Site, study traffic patterns and generally learn about the usage of the Site. We may also use such information for purposes of system administration, to improve the design and content of the Site, and/or to enable us to personalize your Internet experience.

## **How does Kennedy Capital disclose information that it collects via Site?**

We may disclose personally identifiable information about you to third parties who provide services to us. These third parties may provide a variety of services to us including, without limitation, hosting this Site, processing and storing user information, updating your customer information records in our database (including address verification), and sending or coordinating the sending of marketing communications on our behalf. We do not authorize such third parties to make any other use of your information.

We may disclose personally identifiable information in special cases when we have reason to believe that disclosing such information is necessary to identify, contact, or bring legal action against someone who may have breached our [Terms of Use](#) or our service providers' terms of use or who may be causing injury to or interference with (either intentionally or unintentionally) our rights or property, other users of the Site, or anyone else who could be harmed by such

activities. We may also disclose personally identifiable information when we reasonably believe that the law requires it.

We may sell or buy subsidiaries, or business units. In such transactions, personally identifiable information generally is one of the transferred business assets. Also, in the event that some or all of our assets are sold, personally identifiable information may be one of the transferred assets.

We may disclose non-personally identifiable information in aggregate form to third parties including, without limitation, advertisers and business partners.

### **Do you have a choice as to whether to provide information to Kennedy Capital?**

You can choose not to provide personally identifiable information to us. However, if you do not provide such information, you may not be able to access or use certain portions of the Site.

Additionally, you can choose to configure your browser to reject cookies or alert you when cookies are being sent. However, if you refuse to accept cookies, some portions of the Site may not function as intended.

### **Can you access your information?**

If you are a registered user and wish to change, correct or update your personally identifiable information that you provided to us to establish your account, please contact [crc@kennedycapital.com](mailto:crc@kennedycapital.com).

### **Does Kennedy Capital protect the security of information?**

Information transmitted on the Internet and/or stored on systems connected to the Internet is not 100% secure. As a result, we cannot ensure, warrant or guarantee the security or integrity of such information.

### **Does Kennedy Capital collect information from children?**

The Site is a general audience web site. We do not intentionally collect personally identifiable information from users of this Site who are under the age of thirteen.

### **Does the Site contain links to other web sites?**

While you are using the Site, you may be linked or directed to other third party sites outside of the Site that are beyond our control. Each of these third parties may have a privacy policy different from ours. Please review the privacy policies of these sites. We are not responsible for any actions or policies of such third parties.

### **Contact Information**

We welcome your comments regarding this Privacy Policy. Please send any comments to us by email at [crc@kennedycapital.com](mailto:crc@kennedycapital.com).