



Online Privacy Policy

Last updated May 2024

Sbecipher LLC (“Sbecipher”) understands that visitors to this website are concerned about the privacy of their information. This Online Privacy Policy describes how Sbecipher collects, uses, discloses, updates, and protects the information you provide on our website at www.sbecipher.com.

We may revise and update this Online Privacy Policy occasionally without you giving us additional notice. Any changes we may make to this Online Privacy Policy in the future will be posted on this page. Please review the most recent version of the Online Privacy Policy by clicking any “Privacy Policy” link on Sbecipher’s website. We will revise the “Last Updated” date above when we update this Online Privacy Policy.

INFORMATION COLLECTION

Information Collected About Clients and Visitors to Our Website

We collect information from you when you choose to share it with us. This may include when you visit our website, request information from us, or contact us.

The information we collect from you may include:

- Contact information, including your name, address, email address, telephone, or mobile number;
- Employer-related information, such as your title and the company’s name, address, and phone number; and
- Sbecipher account number.

Information Collected about Prospective Employees and Job Applicants

We may collect the following information about you that you either provide to us directly or that we receive from third parties.

- Information About Your Identity (e.g., name, personal email address, cell phone number, mailing address, password, username);
- Career Demographics (job title, job role, profession, education, industry, years of experience, skills);
- Career Interests (career topics, current student, expected date of graduation for current students, majors, locations interested in working, profession category (e.g., financial, tech), work area of interest (e.g., trading, legal), interests in upcoming events);
- Information You Provided In-Person;
- Information You Submit to Us (e.g., submitted images, photos, videos; other items you submit; details about your requests made to us); and
- Job applied for or interested in (including the job opening’s education and experience description).



Information Collected from Third Parties or Other Sources

We may obtain personal or other information about you from third parties or other sources and combine this information with the information we collect from you. This might include any other information obtained through companies that have business relationships with us, such as business partners.

We may also obtain information about you from other online sources, including when you connect with Sbecipher through its official corporate pages on third-party social networks (such as LinkedIn) or the “apps” on those pages. This information may include your name, demographic information, updated address or contact information, interests, and publicly-observed data.

INFORMATION USE

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

- To deliver our services to you For recruiting, position advertising, talent management, and employment purposes (recording, examination, assessment, selection, conclusion of an employment
- With your consent, where applicable, to contact you with information, newsletters, and other materials from Sbecipher;
- To contact you when necessary, including for employment purposes, by email, telephone text message, or by mail;
- To protect the security or integrity of our business, such as by protecting against and preventing fraud, unauthorized transactions, claims, and other liabilities, and managing risk exposure, including by identifying potential hackers and other unauthorized users; and
- As otherwise described to you at the point of data collection.

INFORMATION SHARING

We may disclose the personal information we collect from you with the following categories of third parties and in the following ways:

- With our third-party service providers that provide business, professional, or technical support functions for us;
- As necessary if we believe that there has been a violation of our rights or the rights of any third-party;
- To respond to judicial process or provide information to law enforcement or regulatory agencies or in connection with an investigation on matters related to public safety, as permitted by law, or otherwise as required by law; and
- As otherwise described to you at the point of collection.

We may share your personally identifiable information (“PII”) concerning a merger, financing, acquisition, dissolution transaction, bankruptcy, or proceeding involving the sale, transfer, or divestiture of all or a portion of our business or assets. Suppose another entity acquires our business or assets. In that case, that entity will have your PII collected by us and assume the rights and obligations regarding your information as allowed by this privacy policy.



SBECIPHER
Systematic Portfolio Management

DATA AND NETWORK SECURITY

We maintain strict operational policies, including physical, electronic, and procedural protections, to safeguard and secure our data networks and prevent unauthorized access to data we may collect online. We also have appropriate policies to ensure that any information we collect is used in strict compliance with this Online Privacy Policy.

If you have questions about this Online Privacy Policy, please email us at compliance@sbecipher.com.