

PRIVACY POLICY

Structured Finance Industry Group d/b/a Structured Finance Association (“Structured Finance”, “we”, “our” or “us”) is committed to protecting the privacy of those who entrust us with their personal information. Our users trust and expect that we will protect their personal information in accordance with the promises we make. For the purposes of this Privacy Policy, “personal information” means any information pertaining to an identified or identifiable individual and may include, for example, email addresses and contact details and any similar information provided to us in the course of our business operations. Information that is de-identified or anonymized is not considered personal information. This Privacy Policy details our commitment to your privacy.

1. What Does This Privacy Policy Cover?

This Privacy Policy describes the types of information we collect on the Sites, how we use such information and to whom and under what circumstances we may disclose it. This Privacy Policy applies only our websites (www.structuredfinance.org and www.structuredfinancecoalition.org), our mobile sites, and our use of social media sites (collectively, the “Sites”), and any other personal information obtained when you call, email, or otherwise communicate with Structured Finance.

By visiting the Sites or otherwise interacting with us, you are accepting the practices described in this Privacy Policy. We recommend that you review this Privacy Policy periodically, as it may be updated from time-to-time. If you do not agree to the policy, please do not use the Sites.

2. What Information Does Structured Finance Collect, And How Is It Used And Shared?

For the 12-month period prior to the date of this Privacy Policy, we explain here what categories of personal information we have collected, the purpose of collection, and how we share it:

Category of Personal Information Collected	Source	Purpose For Collection	Categories Of Recipients
Contact information: such as name, mailing address, email address, and telephone number.	From you when you register for or enroll in the Sites, place an order, sign up for our newsletter, contact us, or participate in a Sites promotion or survey.	To communicate with and to help us improve our services to you; to respond to your inquiries; to send you a confirmation email when you make a purchase; to provide you with the products or services you have requested; to inform you about additional products or services that may be of interest to you; to contact you with newsletters	Our affiliates, agents and successors; to the extent relevant, select marketing, technical and other service providers (who perform certain services and functions on our behalf and who are bound by confidentiality obligations).

		and other promotional materials from us and third party marketing offers from our trusted partners; to contact you with the Sites' updates; to monitor compliance with the Sites' terms of use; and legal obligation purposes.	
Blog information: such as information you enter into any blog, review or any other collaborative environment or communication tool available on or through the Sites. We do not ask for, and you should not enter, your full name anywhere in such environment or tool.	From you when you input information into any such environment or tool.	To collaborate and communicate, as contemplated by such environment or tool.	Users who are authorized to view or use such environment or tool (or the applicable portion thereof) or to whom such information is communicated or designated; our affiliates, agents and successors; and, to the extent relevant, select technical and other service providers (who perform certain services and functions on our behalf and who are bound by confidentiality obligations).
Browsing information: such as your IP address, MAC address or other device identifier, the kind of browser or computer you use, pages and content that you visit on the Sites, what you click on, the state and country from which you access the Sites, date and time of your visit, and web pages you linked to the Sites from.	The Sites and your interactions with the Sites, including through the use of cookies and other tracking technologies explained further below.	To evaluate usage of the Sites and improve performance and services; to protect the security and integrity of the Sites and our business, such as preventing fraud, hacking, and other criminal activity or to meet legal obligations.	Our service providers who help us with fraud protection and website analytics.

<p>Payment information: such as name, card issuer and card type, credit or debit card number, expiration date, CVV code, and billing address.</p>	<p>From you or your payment card issuers.</p>	<p>Authorizing of credit card and other financial transactions with respect to payment obligations, as applicable, related to the Sites.</p>	<p>Our card processor stores all credit card information. They conduct the entire credit card transaction using industry standard 128 bit SSL encryption. We only store a record that the transaction took place.</p>
<p>Legal process-related information: such as details of your identity, or suspected or alleged criminal, dangerous, impermissible, unlawful or other relevant behavior.</p>	<p>From crime and fraud prevention agencies, you, witnesses or law enforcement agencies.</p>	<p>To protect users, the public and our business against risks and crime.</p>	<p>Law enforcement and other governmental authorities in accordance with applicable law, our technical and other service providers, and our professional advisors.</p>

In Connection with Business Transfers: In the event that a division, a product or all of Structured Finance is bought, sold or otherwise transferred, or is in the process of a potential transaction, personal information will likely be shared for evaluation purposes and included among the transferred business assets, subject to client contractual requirements and applicable law.

To Comply with Laws: Structured Finance may also disclose specific personal information when such disclosure appears necessary to comply with applicable law, a subpoena in the course of managing a dispute, governmental inquiry or other litigation process. We may also disclose information to our accountants, auditors, agents, lawyers and other advisors in connection with the enforcement or protection of our legal rights or to protect the interests or safety of our users or others, in accordance with or as authorized by law.

In Connection with Our Mailing List: If you sign up for our mailing list, we will send you informational emails about offers of services. At any time, you can ‘unsubscribe’ yourself from our email list simply by clicking the ‘unsubscribe’ button. If you do not wish to receive communications from us about special offers and promotions, you can opt-out of receiving these communications by following the instructions contained in the messages you receive. Even if you opt-out of receiving these messages, we reserve the right to send you certain communications relating to the services we provide, and we may send you service announcements and administrative messages. We do not offer you the opportunity to opt-out of receiving those communications. For more information about interest-based advertising, including how you can manage advertising, please see below “Interest-Based Advertising.”

3. What Are Cookies And How Do We Use Them And Other Technologies?

Like many commercial websites, we analyze how visitors use the Sites through what is known as "cookie" technology. A cookie is a small text file that is placed on your computer when you access the Sites and allows us to recognize you each time you visit the Sites. We may use cookies to: (1) allow you to use the Sites without having to re-enter your user name and password; (2) enhance or personalize your Site usage; (3) monitor Sites usage; (4) manage the Sites; and (5) improve the Sites and our

products and services, including providing you with interest-based ads. For more information on our advertising, see below: “Interest-Based Advertising.” If you choose, you can set your browser to reject cookies or you can manually delete individual cookies or all of the cookies on your computer by following your browser’s help file directions. However, if your browser is set to reject cookies or you manually delete cookies, you may have some trouble accessing and using some of the pages and features that are currently on the Sites, or that we may put on the Sites in the future. Note that browser-management tools for cookies are outside of our control and we cannot guarantee their effectiveness.

We may also use web beacons on the Sites, in our emails, and in our advertisements on other websites. Web beacons are tiny graphic images that are used to collect information about your visit to the Sites, such as the pages you view and the features you use, as well as information about whether you open and/or act upon one of our emails or advertisements. We may also collect the URL of the website you visited immediately before coming to the Sites. Web beacons help us analyze Site visitors' behavior and measure the effectiveness of the Sites and our advertising. We may work with service providers that help us track, collect and analyze this information.

Structured Finance may use Google Analytics to evaluate use of the Sites for our internal purposes such as evaluating usages of the Sites. To learn how Google Analytics collects and processes data, please visit: “How Google uses data when you use our partners’ sites or apps” located at www.google.com/policies/privacy/partners

We may combine the information we collect through cookies and web beacons with other information we have collected from you or information from other sources.

Do Not Track (DNT): This is a privacy preference that users can set in some web browsers, allowing users to opt out of tracking by websites and online services. At the present time, the World Wide Web Consortium, or W3C, has not yet established universal standards for recognizable DNT signals, and therefore Structured Finance and the Sites do not recognize DNT.

4. Interest-Based Advertising

We may use third-party advertising companies that use tracking technologies to serve our advertisements across the Internet. These companies may collect information about your visits to the Sites and other websites and your interaction with our advertising and other communications. These advertising companies serve ads on behalf of us and others on non-affiliated sites, and some of those ads may be personalized, meaning that they are intended to be relevant to you based on information collected about your visits to the Sites and elsewhere over time. Other companies may also use such technology to advertise on the Sites.

You have the choice to tell us not to collect and use this information, and in some jurisdictions, we will only engage in interest-based advertising if you opt-in. If you would like more information about this practice and to know your choices concerning interest-based ads, visit:

<http://www.networkadvertising.org/choices/>

www.aboutads.info/choices

In Canada, please visit: <http://youradchoices.ca/choices/>

In the EU, please visit: <http://www.youronlinechoices.eu/>

5. Retention Of Personal Information

Personal information that we collect, access or process will be retained only as long as necessary for the fulfilment of the purposes for which it was collected, unless otherwise provided for under services contracts with clients or as required or authorized by law. Personal information that is no longer required to fulfil the identified purposes will be destroyed, erased or de-identified.

6. How Is This Privacy Policy Enforced?

Structured Finance has put in place mechanisms to monitor and verify our ongoing adherence to this Privacy Policy. We encourage individuals covered by this Privacy Policy to raise any concerns that they have about the way that we process their personal information by contacting Structured Finance as described below. We take your questions and concerns seriously, and we will use commercially reasonable efforts to resolve them.

7. Security

We maintain reasonable and appropriate measures designed to maintain information we collect in a secure manner. We have taken certain physical, electronic, and administrative steps to safeguard and secure the information we collect from visitors to the Sites. Even though we follow reasonable procedures to try to protect the information in our possession, no security system is perfect and we cannot promise, and you should not expect, that your information will be secure in all circumstances.

8. Children

Structured Finance and the Sites are not directed toward children and we do not knowingly solicit or collect personal information online from children under the age of 13 without prior verifiable parental consent. If Structured Finance learns that a child under the age of 13 has submitted personal information online without parental consent, we will take all reasonable measures to delete such information from our databases and to not use such information for any purpose (except where necessary to protect the safety of the child or others as required or allowed by law). If you become aware of any personal information we have collected from children under age 13, please contact us using the information detailed in "Contacting Us" below.

9. Access, Objection, Deletion and Correction

In certain jurisdictions, you may have the right to obtain confirmation as to whether your personal information is being processed, information about the purposes of that processing, and information about the recipients to whom your personal information have been or will be disclosed. You may also have the right to receive a copy of the personal information you have provided and/or request its deletion.

Our clients are responsible for managing any request made by their users regarding access to and rectification of their personal information that is transferred to us. However, if you have questions about your rights, please feel free to contact using the contact information detailed in "Contacting Us" below.

10. Third Party Websites

The Sites may contain links to third-party websites, such as social media sites like LinkedIn and Twitter, which may have privacy policies that differ from our own. We are not responsible for the activities and practices that take place on these websites. Accordingly, we recommend that you review the privacy policy posted on any external site before disclosing any personal information. Please contact those websites directly if you have any questions about their privacy policies.

11. Your California Privacy Rights

If you are a California resident, California law provides you with the following rights with respect to your personal information:

- The right to know what personal information we have collected, used, disclosed and sold about you. You may submit a request to know by using the information detailed in “Contacting Us” below. You also may designate an authorized agent to make a request for access on your behalf.
- The right to request that we delete any personal information we have collected about you. You may submit a request for deletion by using the information detailed in “Contacting Us” below. You also may designate an authorized agent to make a request for deletion on your behalf.

When you exercise these rights and submit a request to us, we may verify your identity. We also may use a third party verification provider to verify your identity. Your exercise of these rights will have no adverse effect on the price and quality of our goods or services.

For the 12-month period prior to the date of this Privacy Policy, we have not sold personal information about our users; nor do we have any plans to do so in the future.

12. Right To Removal Of Posted Information – California Minors

If you under 18 years of age, reside in California, and have a registered account with us, you have the right to request removal of unwanted information that you publicly post on the Sites. To request removal of such information, you can contact us as described in “Contacting Us”. Upon receiving a request, we will make sure that the information is not publicly available on the Sites, but the information may not be completely or comprehensively removed from our systems or databases.

13. Visitors From Outside The United States – Cross Border Transfers

The Sites are hosted in the United States. If you are visiting the Sites from outside the United States, your information may be transferred to, stored and processed in the United States or other countries in accordance with this Privacy Policy. The data protection and other applicable laws of the United States or other countries may not be as comprehensive as those laws or regulations in your country or may otherwise differ from the data protection or consumer protection laws in your country. Your information may be available to government authorities under lawful orders and law applicable in such jurisdictions. By using the Sites and/or providing personal information to us, you consent to transfer of your information to our facilities as described in this Privacy Policy.

14. Right To Lodge Complaints

We are transparent about the ways in which we collect and use personal information, and welcome your questions and concerns. If you have any concern or complaint about the way we handle your personal information, please contact us as described in “Contacting Us”. To the extent you believe we have not addressed your concerns or otherwise choose to do so, you have the right to lodge a complaint with a supervisory authority in the country where you reside and/or the United States. You may contact the US Federal Trade Commission regarding your concerns. For more information, please see <https://www.ftc.gov/faq/consumer-protection/submit-consumer-complaint-ftc>.

15. Changes To This Privacy Policy

We will review and update this Privacy Policy as required to keep current with rules and regulations, new technologies and security standards. We will post those changes on the Sites and/or update the Privacy Policy modification date below. In certain cases and if the changes are material, we will provide written notice to clients directly by email or otherwise.

This Privacy Policy is effective as of January 1, 2020.

16. RFID Devices

In order to deliver this event, we utilize radio frequency technology-enable badges that send and receive radio frequency signals through a small antenna in the device (“Badges”). Each event attendee will be issued one of these Badges, which will allow us to authenticate the individual using the Badge and the benefits associated with that individual. A Badge may be used in one or more of the following ways: to record real time attendance so attendees don’t have to wait in line to check-in to sessions, to track when attendees enter or leave a session as well as when they access other areas of the event. Badges are non-transferable. Attendees are responsible for keeping their assigned Badges safe and secure at all times. If your Badge is lost or stolen, please contact us immediately for assistance. Badges are intended for use at this event only.

17. Contacting Us

If you have questions or concerns about this Privacy Policy, how we collect and use the information of our customers, or to request a copy of this Privacy Policy in another format, you may contact us using the information below.

Structured Finance Association
Attn: Privacy Request
1776 I St. NW, Washington, D.C. 20006
202-524-6300
info@structuredfinance.org

If we need, or are required, to contact you concerning any event that involves your information, we may do so by email, telephone, or mail.