

ASB Capital Management LLC Website Privacy Policy

This Policy was last updated: August 27, 2026

This Privacy Policy (“**Policy**”) describes how ASB Capital Management LLC and our brands, affiliates, and subsidiaries (“**ASB**,” “**we**,” “**us**,” and “**our**”) collect, use, and disclose your Personal Information when you visit any of our websites (the “**Sites**”) or otherwise interact with any of our features or services that reference this Policy (collectively, the “**Services**”). This Policy also explains how you can exercise certain rights you may have in connection with your privacy and personal information.

Your use of our Services, and any dispute over privacy, is subject to this Policy.

For ease of reference, you may click on any of the following links to jump to one of the sections addressed below:

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Our Commitment to You

Our privacy commitments are fundamental to the way we run our business. These commitments apply to everyone who has a relationship with us - including customers, partners and website visitors. We are committed to providing you with the best overall experiences in all of our products and services. We strive to strike the right balance

between using your data to ensure the quality of those experiences and protecting your privacy.

Scope of this Privacy Policy

This Policy applies to all ASB websites and covers only the Services identified above and does not apply to information which you may send us by other means. If you are an investor in a fund, collective investment trust or other investment vehicle for which we act as investment advisor (collectively, “**Investors**”), please visit our **Investor Privacy Policy** at: <https://www.asbcm.com/investor-privacy-policy/> to learn more about how we handle your Personal Information.

These Services are intended only for users located in the United States. ASB does not offer or market these Services to individuals in the European Economic Area, Switzerland, or the United Kingdom.

Accessibility Statement

ASB is committed to making its website, <https://www.asbcm.com>, usable by all people, including those with disabilities. We are constantly in the process of making upgrades to achieve this goal.

Our Commitment to Help

We are dedicated to meeting your accessibility needs. Should you have specific questions or concerns about the accessibility of this site or need assistance in using the processes found within this site, we have individuals here at ASB to assist you.

Please contact us directly at privacy@asbcm.com. We would be happy to assist in making your visits to our site as convenient as possible.

Third Party Applications

While you are visiting our site, you will notice that we make use of third-party sites. Though individuals may have challenges with access to these sites, ASB does not control or remedy the way content is portrayed.

Personal Information We Collect, Use and Share

Personal information is generally defined as information that, by itself or in combination with other information, identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, device, or household (“Personal Information”). Personal Information can include, but is not limited to, your name, address, telephone number, email address, username and password, IP address or other online identifiers, browsing or search history, credit/debit card number or other financial information, professional or employment-related information, office address and other business information,

demographic information, consumer preferences, biometric information such as fingerprints, precise location information, or any other type of information that, directly or indirectly, can be linked to or is reasonably capable of being associated with you.

We will only collect, use and share your personal information where we are satisfied that we have a legal basis to do so. In these cases we will look after your information at all times in a way that is proportionate and respects your privacy rights. We will not take any action that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

When using ASB Services, we may collect, use, and share the following categories of Personal Information from you in the following ways:

Categories of Personal Information we collect	We may collect this Personal Information when you...	We collect this Personal Information so that we may...	Types of third parties that may receive this Personal Information
Contact information such as your name, email, phone number, and address.	• Send us an email or call via phone. • Embed information into documentation sent over email.	• Operate our Business. We use Personal Information to allow you to use our Services, and otherwise run our day-to-day operations. • To Communicate With You. We may use Personal Information to communicate with you about our Services, and to respond to your inquiries, including if you contact us with a question or concern. • Evaluate and Improve our Services. We may use the Personal Information we collect to evaluate and improve our Services and to measure, improve, and understand the effectiveness of our Services and its features. We may also use this information to develop new Service offerings. • Marketing and Advertising. We may use Personal Information to contact you with surveys and information regarding our Services and those of our business partners that we believe may be of interest to you. This may include commercial emails sent on behalf of ourselves, our affiliates, and our advertisers. • Security Purposes. We may use Personal Information to mitigate fraud and protect ASB. • Legal Requirements. We may use Personal Information to comply with	• We disclose information we collect from you to service providers, consultants, auditors, attorneys, vendors, contractors, or agents who perform functions on our behalf. This includes entities that host our Site, perform research and development, and assist us in performing analytics on our Site. • We may disclose your information to our business partners for purposes of providing the Services. • We disclose the information we collect from you to our affiliates or subsidiaries. • We may disclose your information to others when it is necessary to provide the Services you requested. • If (i) we or our affiliates are or may be acquired by, merged with, or invested in by another company, or (ii) if any of our shares or assets are or may be transferred to another company, whether as part of a bankruptcy or insolvency proceeding or otherwise, we may transfer the information we have collected from you to the other company. As part of the business transfer process, we may share certain of your personal information with lenders, auditors, and advisors, including attorneys and consultants.

		lawful court orders, law enforcement requests, or other legal requirements. • Other Operational Purposes. We may use Personal Information for purposes not provided for in this Policy, but if we do, we will notify you (and, if necessary, obtain your consent) before using your Personal Information in this way.	• We disclose Personal Information to comply with the law, a judicial proceeding, court order, or other legal process, such as in response to a court order or a subpoena. • We disclose Personal Information when we believe it is appropriate to do so to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, violations of this Policy, or as evidence in litigation in which we are involved. • We may disclose Personal Information for a new use or purpose not described in this Policy. If we do so, we will notify you before disclosure and, if necessary, provide you with the choice of opt-in or opt-out consent.
Message contents if you contact us, such as when you send us an email, we may collect records and copies of your correspondence, including your name, email, and any other information you choose to provide or communicate to us while using the Services.	• Send us an email or call via phone. • Embed information into documentation sent over email.	• Operate our Business. We use Personal Information to allow you to use our Services, and otherwise run our day-to-day operations. • To Communicate With You. We may use Personal Information to communicate with you about our Services, and to respond to your inquiries, including if you contact us with a question or concern. • Evaluate and Improve our Services. We may use the Personal Information we collect to evaluate and improve our Services and to measure, improve, and understand the effectiveness of our Services and its features. We may also use this information to develop new Service offerings. • Marketing and Advertising. We may use Personal Information to contact you with surveys and information regarding our Services and those of our business partners that we believe may be of interest to you. This may include commercial emails sent on behalf of ourselves, our affiliates, and our advertisers. • Security Purposes. We may use Personal Information to	• We disclose information we collect from you to service providers, consultants, auditors, attorneys, vendors, contractors, or agents who perform functions on our behalf. This includes entities that host our Site, perform research and development, and assist us in performing analytics on our Site. • We may disclose your information to our business partners for purposes of providing the Services. • We disclose the information we collect from you to our affiliates or subsidiaries. • We may disclose your information to others when it is necessary to provide the Services you requested. • If (i) we or our affiliates are or may be acquired by, merged with, or invested in by another company, or (ii) if any of our shares or assets are or may be transferred to another company, whether as part of a bankruptcy or insolvency proceeding or otherwise, we may transfer the information we have collected from you to the other company. As part of

		mitigate fraud and protect ASB. • Legal Requirements. We may use Personal Information to comply with lawful court orders, law enforcement requests, or other legal requirements. • Other Operational Purposes. We may use Personal Information for purposes not provided for in this Policy, but if we do, we will notify you (and, if necessary, obtain your consent) before using your Personal Information in this way.	the business transfer process, we may share certain of your personal information with lenders, auditors, and advisors, including attorneys and consultants. • We disclose Personal Information to comply with the law, a judicial proceeding, court order, or other legal process, such as in response to a court order or a subpoena. • We disclose Personal Information when we believe it is appropriate to do so to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, violations of this Policy, or as evidence in litigation in which we are involved. • We may disclose Personal Information for a new use or purpose not described in this Policy. If we do so, we will notify you before disclosure and, if necessary, provide you with the choice of opt-in or opt-out consent.
Preferences you may select regarding communication and the types of Services you use	• Send us an email or call via phone.	• Operate our Business. We use Personal Information to allow you to use our Services, and otherwise run our day-to-day operations. • To Communicate With You. We may use Personal Information to communicate with you about our Services, and to respond to your inquiries, including if you contact us with a question or concern. • Evaluate and Improve our Services. We may use the Personal Information we collect to evaluate and improve our Services and to measure, improve, and understand the effectiveness of our Services and its features. We may also use this information to develop new Service offerings. • Marketing and Advertising. We may use Personal Information to contact you with surveys and information regarding our Services and those of our business partners that we	• We disclose information we collect from you to service providers, consultants, auditors, attorneys, vendors, contractors, or agents who perform functions on our behalf. This includes entities that host our Site, perform research and development, and assist us in performing analytics on our Site. • We may disclose your information to our business partners for purposes of providing the Services. • We disclose the information we collect from you to our affiliates or subsidiaries. • We may disclose your information to others when it is necessary to provide the Services you requested. • If (i) we or our affiliates are or may be acquired by, merged with, or invested in by another company, or (ii) if any of our shares or assets are or may be

		believe may be of interest to you. This may include commercial emails sent on behalf of ourselves, our affiliates, and our advertisers. • Security Purposes. We may use Personal Information to mitigate fraud and protect ASB. • Legal Requirements. We may use Personal Information to comply with lawful court orders, law enforcement requests, or other legal requirements. • Other Operational Purposes. We may use Personal Information for purposes not provided for in this Policy, but if we do, we will notify you (and, if necessary, obtain your consent) before using your Personal Information in this way.	transferred to another company, whether as part of a bankruptcy or insolvency proceeding or otherwise, we may transfer the information we have collected from you to the other company. As part of the business transfer process, we may share certain of your personal information with lenders, auditors, and advisors, including attorneys and consultants. • We disclose Personal Information to comply with the law, a judicial proceeding, court order, or other legal process, such as in response to a court order or a subpoena. • We disclose Personal Information when we believe it is appropriate to do so to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, violations of this Policy, or as evidence in litigation in which we are involved. • We may disclose Personal Information for a new use or purpose not described in this Policy. If we do so, we will notify you before disclosure and, if necessary, provide you with the choice of opt-in or opt-out consent.
When you visit our Site, we may automatically collect information such as IP address, unique device identifiers, operating system, and other information related to the device used to access our Services.	• Automatically visit the site.	• Operate our Business. We use Personal Information to allow you to use our Services, and otherwise run our day-to-day operations. • To Communicate With You. We may use Personal Information to communicate with you about our Services, and to respond to your inquiries, including if you contact us with a question or concern. • Evaluate and Improve our Services. We may use the Personal Information we collect to evaluate and improve our Services and to measure, improve, and understand the effectiveness of our Services and its features. We may also use this	• We disclose information we collect from you to service providers, consultants, auditors, attorneys, vendors, contractors, or agents who perform functions on our behalf. This includes entities that host our Site, perform research and development, and assist us in performing analytics on our Site. • We may disclose your information to our business partners for purposes of providing the Services. • We disclose the information we collect from you to our affiliates or subsidiaries. • We may disclose your information to others when it is necessary to provide

		information to develop new Service offerings. • Marketing and Advertising. We may use Personal Information to contact you with surveys and information regarding our Services and those of our business partners that we believe may be of interest to you. This may include commercial emails sent on behalf of ourselves, our affiliates, and our advertisers. • Security Purposes. We may use Personal Information to mitigate fraud and protect ASB. • Legal Requirements. We may use Personal Information to comply with lawful court orders, law enforcement requests, or other legal requirements. • Other Operational Purposes. We may use Personal Information for purposes not provided for in this Policy, but if we do, we will notify you (and, if necessary, obtain your consent) before using your Personal Information in this way.	the Services you requested. • If (i) we or our affiliates are or may be acquired by, merged with, or invested in by another company, or (ii) if any of our shares or assets are or may be transferred to another company, whether as part of a bankruptcy or insolvency proceeding or otherwise, we may transfer the information we have collected from you to the other company. As part of the business transfer process, we may share certain of your personal information with lenders, auditors, and advisors, including attorneys and consultants. • We disclose Personal Information to comply with the law, a judicial proceeding, court order, or other legal process, such as in response to a court order or a subpoena. • We disclose Personal Information when we believe it is appropriate to do so to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, violations of this Policy, or as evidence in litigation in which we are involved. • We may disclose Personal Information for a new use or purpose not described in this Policy. If we do so, we will notify you before disclosure and, if necessary, provide you with the choice of opt-in or opt-out consent.
We may collect information related to how you interact with the Services and advertisements, such as referring and exit web pages and URLs, browsing history, and other similar information. As described below in the "Our Use of Cookies" section, we may use analytics providers and technologies, including cookies and similar tools, to collect this information.	• Automatically visit the site.	• Operate our Business. We use Personal Information to allow you to use our Services, and otherwise run our day-to-day operations. • To Communicate With You. We may use Personal Information to communicate with you about our Services, and to respond to your inquiries, including if you contact us with a question or concern. • Evaluate and Improve our Services. We may use the	• We disclose information we collect from you to service providers, consultants, auditors, attorneys, vendors, contractors, or agents who perform functions on our behalf. This includes entities that host our Site, perform research and development, and assist us in performing analytics on our Site. • We may disclose your information to our business

		Personal Information we collect to evaluate and improve our Services and to measure, improve, and understand the effectiveness of our Services and its features. We may also use this information to develop new Service offerings. • Marketing and Advertising. We may use Personal Information to contact you with surveys and information regarding our Services and those of our business partners that we believe may be of interest to you. This may include commercial emails sent on behalf of ourselves, our affiliates, and our advertisers. • Security Purposes. We may use Personal Information to mitigate fraud and protect ASB. • Legal Requirements. We may use Personal Information to comply with lawful court orders, law enforcement requests, or other legal requirements. • Other Operational Purposes. We may use Personal Information for purposes not provided for in this Policy, but if we do, we will notify you (and, if necessary, obtain your consent) before using your Personal Information in this way.	partners for purposes of providing the Services. • We disclose the information we collect from you to our affiliates or subsidiaries. • We may disclose your information to others when it is necessary to provide the Services you requested. • If (i) we or our affiliates are or may be acquired by, merged with, or invested in by another company, or (ii) if any of our shares or assets are or may be transferred to another company, whether as part of a bankruptcy or insolvency proceeding or otherwise, we may transfer the information we have collected from you to the other company. As part of the business transfer process, we may share certain of your personal information with lenders, auditors, and advisors, including attorneys and consultants. • We disclose Personal Information to comply with the law, a judicial proceeding, court order, or other legal process, such as in response to a court order or a subpoena. • We disclose Personal Information when we believe it is appropriate to do so to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, violations of this Policy, or as evidence in litigation in which we are involved. • We may disclose Personal Information for a new use or purpose not described in this Policy. If we do so, we will notify you before disclosure and, if necessary, provide you with the choice of opt-in or opt-out consent.
When you use the Services, we may collect Personal Information about you through our affiliates, business partners, and	• Use our Services which involve our affiliates, business partners, and vendors.	• Operate our Business. We use Personal Information to allow you to use our Services, and otherwise run our day-to-day operations.	• We disclose information we collect from you to service providers, consultants, auditors, attorneys, vendors, contractors, or agents who perform

vendors who provide services on our behalf.		• To Communicate With You. We may use Personal Information to communicate with you about our Services, and to respond to your inquiries, including if you contact us with a question or concern. • Evaluate and Improve our Services. We may use the Personal Information we collect to evaluate and improve our Services and to measure, improve, and understand the effectiveness of our Services and its features. We may also use this information to develop new Service offerings. • Marketing and Advertising. We may use Personal Information to contact you with surveys and information regarding our Services and those of our business partners that we believe may be of interest to you. This may include commercial emails sent on behalf of ourselves, our affiliates, and our advertisers. • Security Purposes. We may use Personal Information to mitigate fraud and protect ASB. • Legal Requirements. We may use Personal Information to comply with lawful court orders, law enforcement requests, or other legal requirements. • Other Operational Purposes. We may use Personal Information for purposes not provided for in this Policy, but if we do, we will notify you (and, if necessary, obtain your consent) before using your Personal Information in this way.	functions on our behalf. This includes entities that host our Site, perform research and development, and assist us in performing analytics on our Site. • We may disclose your information to our business partners for purposes of providing the Services. • We disclose the information we collect from you to our affiliates or subsidiaries. • We may disclose your information to others when it is necessary to provide the Services you requested. • If (i) we or our affiliates are or may be acquired by, merged with, or invested in by another company, or (ii) if any of our shares or assets are or may be transferred to another company, whether as part of a bankruptcy or insolvency proceeding or otherwise, we may transfer the information we have collected from you to the other company. As part of the business transfer process, we may share certain of your personal information with lenders, auditors, and advisors, including attorneys and consultants. • We disclose Personal Information to comply with the law, a judicial proceeding, court order, or other legal process, such as in response to a court order or a subpoena. • We disclose Personal Information when we believe it is appropriate to do so to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, violations of this Policy, or as evidence in litigation in which we are involved. • We may disclose Personal Information for a new use or purpose not described in this Policy. If we do so, we will notify you before disclosure and, if necessary, provide you with
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			the choice of opt-in or opt-out consent.
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In the past twelve months, we have not sold any personal information.

Choice for Collection and Use of Information

We give you choices about the ways we collect, use, and share your personal data. You can choose what contact, and financial information will be stored in your account and preferences. However, if you choose not to provide certain details, some of your experiences with us may be affected. If at any point in time you wish to know what data we process about you, you can request to access the information by contacting privacy@asbcm.com.

Consent / Withdrawing Consent

We strive to let you know in advance what will happen to your personal data. We will not use your personal data for a purpose that is materially different from the purposes listed in this policy, or disclose it to a third party acting as a controller not previously identified, without first offering you the opportunity to opt-out of such uses and/or provide disclosures. If we intend to use your sensitive personal data for a purpose not identified in this policy, we will reach out to you to get your explicit consent before doing so.

Our Use of Cookies

Cookies are small text files that are placed on your computer by websites to track your individual movements on that website over time.

We use the following categories of cookies:

- Essential cookies - These are used to authenticate you, prevent fraud and provide you with the services that you have requested.
- Functional cookies - These are used to remember you and recall your settings or preferences (such as language) when you return to our website. These cookies are not used to track you when you visit other websites.
- Performance cookies - These are used to measure the performance of our website and online services. We use the information gathered from these cookies to improve our sites, as well as the products and services we offer.
- (Targeted) Advertising cookies - These are used to record the websites you have visited in order to deliver customized ads to you. You can control the placement of these cookies either via turning on Global Privacy Control (GPC) in your browser or by using the cookie management tool located on the bottom corner of our website.

Cookies may be session-based or persistent. Session-based cookies last only for the duration of a user's session, while a persistent cookie remains on the user's hard drive. A persistent cookie can help us recognize you when you return to our website and recall your settings or preferences.

If you do not want a cookie placed on your computer as a result of using our website, you can disable cookies altogether by modifying the preferences section of your web browser. Note that if you do so, some aspects of our website may be unavailable to you. If you choose to accept cookies on your hard drive, but wish to be informed of their appearance, you may turn on a warning prompt by modifying the cookie-warning section also located in the preferences section of your web browser.

Depending on your cookie consent selection of settings upon first visiting our website, tracking cookies, third-party cookies and other technologies such as web beacons may be used to process additional information, enable noncore functionalities on our website and enable referenced third-party functions (such as a social media "share" link).

Interest-Based Advertising

We may ourselves, or with third-party vendors, use non-personal information in connection with our own or vendor information to deliver targeted advertising to you when you visit other websites or our site. For example, if you are searching for information on a particular product, we or our vendor may cause an advertisement to appear on other websites you view with information on that product. This form of advertising, sometimes called "behavioral advertising," is not based on any information that specifically identifies you. As a result, we and our vendor know your interests, but do not personally identify you in connection with the delivery of that specific ad. We believe that such advertising is helpful because you will see advertisements that are relevant to your interests. However, if you would like to opt out of these interest-based advertisements, please visit our cookie management tool located on the bottom corner of our website

Social Media Engagement

Our websites include social media features, such as the Facebook Like button and other widgets that run on our site. These features may collect your IP address and which page you are visiting on our site and may set a cookie to enable the feature to function properly. Social media features and widgets are either hosted by a third party or hosted directly on our site. Your interactions with these features are governed by the privacy policy of the organization providing it. For example, if you create or log into your account through a third-party social networking site, we may have access to certain information from that site, such as your name, account information and friends, in accordance with the authorization procedures determined by such third-party social networking site. We may also collect information about you from other sources to help us correct or supplement our records, improve the quality or personalization of our services to you, and prevent or detect fraud. We work closely with third parties (for example, business partners, service

providers, sub-contractors, advertising networks, analytics providers, search information providers, fraud protection services) in an effort to constantly improve our products and services and may receive information about you from them.

Do Not Track

Some browsers offer a “Do Not Track” (DNT) setting. Our website responds to Global Privacy Control (GPC) signals as described above. Other browser based DNT signals may not be uniformly supported.

Information Regarding Children

ASB’s Services are intended for individuals 18 years of age and older. Our Services are not directed at, marketed to, nor intended for, children under 16 years of age. ASB does not knowingly collect or sell any information, including Personal Information, from children under 16 years of age. If ASB learns that it has collected any information regarding a person younger than 16 years of age, ASB will delete or destroy the information immediately.

If there is concern that information regarding a person younger than 16 years of age was somehow collected by ASB, any minor, or the parent(s) or legal guardian(s) of such minor, who wishes to request the removal of the minor’s information should submit their request by using the contact details provided in the “**Contact Us**” section below.

Your Privacy Rights

We provide you with certain rights regarding your personal data, subject to certain exceptions and limitations. Those rights include -

- 1) Right to request access to the personal data we have collected about you, restrict the processing of specific pieces of personal information we collected about you and learn how we collect this information, our purpose in collecting it,
- 2) Right to correct or delete the personal data we have collected from you,
- 3) Right to opt-out of the sale or sharing of your personal data,
- 4) Right to limit use and disclosure of sensitive personal information, if applicable and
- 5) Right not to receive discriminatory treatment for the exercise of [the relevant] privacy rights conferred by applicable laws.

Under CPRA, residents of California may exercise employee rights. If applicable, we provide employees with certain rights regarding your personal data, subject to certain exceptions and limitations –

- 1) Right to request access to the personal data we have collected about you, restrict the processing of specific pieces of personal information we collected about you and learn how we collect this information, our purpose in collecting it,
- 2) Right to correct or delete the personal data we have collected from you,

- 3) Right to opt-out of our sale(s) of your personal data,
- 4) Right to limit use and disclosure of sensitive personal information, if applicable and
- 5) Right not to receive discriminatory treatment for the exercise of privacy rights conferred by applicable laws.

If applicable under CPRA, “Sensitive personal information” means: (A) personal information that reveals your social security, driver’s license, state identification card, or passport number; account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account; precise geolocation; racial or ethnic origin, religious or philosophical beliefs, or union membership; the contents of your mail, email and text messages, unless we are the intended recipient of the communication; genetic data; and the processing of biometric information for the purpose of uniquely identifying you; (B) personal information collected and analyzed concerning your health; or (C) personal information collected and analyzed concerning your sex life or sexual orientation. Note that “Sensitive personal information” excludes information that is made publicly available.

We do not use or disclose sensitive personal information for purposes to which the right to limit use and disclosure applies under the CCPA.

If you would like to access, review, edit, delete or have us properly dispose of any copies of the Personal Information that ASB collected about you (subject to any applicable legal exceptions), or if you would like to exercise the above rights in any other way, please contact us at privacy@asbcm.com.

You may be able to opt-out of ASB sharing your Personal Information with the entities identified in this Policy by sending us an email at the address above, unless the sharing of your Personal Information is necessary to perform one of the following business purposes: to count ad impressions and evaluate their effectiveness; to detect, protect against, and prosecute security incidents; to debug or troubleshoot functional errors that may arise with the Services; to complete short-term tasks related to an existing interaction you have with ASB; to maintain or service your account; to process payments and fulfill orders or other transactions you authorize; to verify your customer information; and to ensure the safety and quality of the Services.

ASB will do its best to accommodate any request to delete or properly dispose of any copies of your Personal Information, but we cannot guarantee we can eliminate all Personal Information from the specified uses. Therefore, please be as specific as possible in any request to delete or dispose of copies of your Personal Information. We may deny your deletion request if retaining the information is necessary for us or our service providers to:

- Complete the transaction for which we collected the Personal Information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise to perform a contract we entered into with you;

- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities;
- Debug products to identify and repair errors that impair existing intended functionality;
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law;
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546);
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent;
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us;
- Comply with a legal obligation; or
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

If you choose to delete certain portions of your Personal Information, it may affect your ability to use certain ASB Services. If the request relates to information that ASB needs to make the Site or other Services function properly for you, you may no longer be able to use those Services. Any removal of content by ASB does not ensure or guarantee complete or comprehensive removal of the content in all places. The content may have been shared or reposted by other parties, or federal or state law may require maintenance of the content or information.

You may grant an authorized agent written permission to submit requests regarding your Personal Information, but we may deny authorized agent requests absent proof that you authorized such agent to act on your behalf, or if we are unable to verify your identity.

ASB is required to verify the identity of any person or entity that requests the disclosure or deletion of Personal Information. If you have a password-protected account with us, we will use our existing authentication procedures to verify your identity. For most other consumer requests, ASB will ask you to provide information that matches at least two pieces of personal information we store about you before responding to your request. If you would like to request the specific pieces of your personal information that ASB has collected, or if you would like us to delete highly sensitive information, you will need to match at least three pieces of information we store about you, and you must provide a signed declaration under penalty of perjury that you are the consumer whose personal information you are requesting.

We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authority to make the request and confirm the Personal Information relates to you. Making a verifiable consumer request does not require you to create an

account with us. We will only use Personal Information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

We may send periodic promotional emails to you. You may opt-out of promotional emails by following the opt-out instructions contained in the email. If you opt-out of receiving promotional emails, we may still send you emails about other services you have requested to receive from us.

Retention and Disposal of Personal Information

ASB retains collected information for a reasonable amount of time in order to fulfill the stated purpose for why the information was collected. ASB will also retain collected information connected to business records for periods of time required by law. If ASB determines that collected information is no longer needed, it will delete such information.

Securing Personal Information

ASB is committed to protecting the privacy and confidentiality of your personal information. We maintain physical, electronic and procedural safeguards to protect the information against loss, misuse, damage or modification and unauthorized access or disclosure. Some of the other central features of our information security program are:

- A dedicated group that designs, implements and provides oversight to our information security program;
- The use of specialized technology such as firewalls;
- Testing of the security and operability of products and services before they are introduced to the Internet, as well as ongoing scanning for publicly known vulnerabilities in the technology;
- Internal and external reviews of our Internet sites and services;
- Monitoring of our systems infrastructure to detect weaknesses and potential intrusions;
- Implementing controls to identify, authenticate and authorize access to various systems or sites;
- Protecting information during transmission through various means including, where appropriate, encryption; and
- Providing ASB personnel with relevant training and continually updating our security practices in light of new risks and developments in technology.

Legal Disclaimers

Nothing in this Policy restricts our ability to:

- Comply with federal, state, or local laws;

- Comply with a civil, criminal, or regulatory inquiry, investigation, subpoena, or summons by federal, state, or local authorities;
- Cooperate with law enforcement agencies concerning conduct or activity that we reasonably and in good faith believe may violate federal, state, or local law;
- Exercise or defend legal claims;
- Detect security incidents and protect against fraudulent or illegal activity and prosecute those responsible for such activity; or
- Transfer Personal Information as part of a merger or acquisition, dissolution, bankruptcy, or any other transaction in which a third party assumes control of all or part of our business.

Links to Other Sites

Our Site and Services may contain links to unaffiliated websites. Any access to and use of such linked websites is not governed by this Policy, but instead is governed by the privacy policies of those websites. We are not responsible for the information practices of such websites.

Updates to This Policy

This Policy is current as of the Effective Date set forth above. We may change this Policy from time to time, so please be sure to check back periodically. We will post any changes to this Policy on our Site. ASB “customers” will receive notice of this material change and be notified at least annually if this Policy changes.

Contact Us

If you have questions about this Policy, the privacy aspects of our Site or Services, or would like to make an inquiry, complaint, or dispute, please contact us at:

Privacy Team c/o Legal Department
ASB Capital Management LLC
7501 Wisconsin Avenue
Suite 1300W
Bethesda, MD 20814
Email: privacy@asbcm.com

ASB intends to strictly enforce this Policy. If you believe there has been some violation of this Policy, please contact ASB.