

INTRODUCTION

EYRA LLC, a professional limited liability company formed in the District of Columbia (“**EYRA**” “**us**,” “**our**,” and “**we**”), respects your privacy and is committed to protecting it through our compliance with this Privacy Policy (“**Policy**”).

This Policy describes the types of information we may collect from you or that you may provide when you visit <https://eyraadvisors.com> (our “**Website**”) and our practices for collecting, using, maintaining, protecting, and disclosing that information. This Policy applies to information we collect:

- On this Website.
- In email, text, and other electronic messages between you and this Website.

It does not apply to information collected by:

- EYRA offline or through any other means, including on any other website operated by EYRA or any third party; or
- Any third party, including through any application or content (including advertising) that may link to or be accessible from or on the Website.

Please read this Policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, you have the option to choose not to use our Website.

By accessing and using our Website, you acknowledge that you have read, understood and you are giving your informed, specific and free consent regarding all the Terms and Conditions set forth in this Policy. Additionally, this Policy may be updated from time to time, and we encourage you to review it periodically. Any changes will be effective immediately upon posting on the Website. Your continued use of this Website after we make changes is deemed to be an acceptance of those changes, so please check the Policy periodically for updates.

INTENDED USERS OF THE WEBSITE

Our Website is intended for general audience and are directed to users who are of legal age. Minors who lack the legal capacity under any applicable laws shall not use our Website. No one under the legal age may provide any personal information to or on the Website. We do not knowingly collect personal information from minors. If you are a minor, do not use or provide any information on this Website or through any of its features, register on the Website, or provide any information about yourself to us, including your name, address, telephone and/or mobile number, or email address. Any person who becomes aware of or believes that a minor is using our Services shall immediately contact us. If we learn that we have collected or received

personal information from a minor without verification of parental consent, we will delete that information.

INFORMATION WE COLLECT ABOUT YOU AND HOW WE COLLECT IT

We collect several types of information from and about users of our Website, including information:

- By which you may be personally identified, such as name, company's name, postal address, email address, password, and telephone and/or mobile number ("**personal information**"). Personal information includes "personal data" as defined under the European Union's General Data Privacy Regulation ("GDPR") and the California Consumer Privacy Act ("CCPA") [1], and their equivalents under other data privacy laws in the United States; and/or
- About your internet connection, the equipment you use to access our Website, and usage details.

We collect this information:

- Directly from you when you provide it to us.
- Automatically as you navigate through the site. Information collected automatically may include usage details, IP addresses, and information collected through cookies and other tracking technologies.
- From third parties, for example, our business partners.

Information You Provide to Us

The information we collect on or through our Website may include:

- Information that you provide by filling in forms on our Website. This includes information provided at the time of registering for our events, subscribing to our newsletters or email blasts, or requesting any services. We may also ask you for information when you report a problem with our Website.
- Records and copies of your correspondence (including personal information), if you contact us.
- Your responses to surveys that we might ask you to complete for research purposes.
- Your search queries and information you input into any open text box on the Website.

Information We Collect Through Automatic Data Collection Technologies

As you navigate through and interact with our Website, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- Details of your visits to our Website, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Website.
- Information about your computer and internet connection, including your IP address, operating system, and browser type.

The information we collect automatically may include personal information, or we may maintain it or associate it with personal information we collect in other ways or receive from third parties. It helps us to improve our Website and to deliver a better and more personalized service, including by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Website according to your individual interests.
- Recognize you when you return to our Website.

The technologies we use for this automatic data collection may include:

- **Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website.
- **Web Beacons.** Pages of our Website and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit EYRA, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

HOW WE USE YOUR INFORMATION

The information will be used and treated transparently, for specific and licit purposes, avoiding any use or processing that may affect the rights or freedoms of the users.

We use information that we collect about you or that you provide to us, including any personal information:

- To present our Website and its contents to you.
- To provide you with information or services that you request from us.
- To fulfill any other purpose for which you provide it.
- To notify you about changes to our Website or any products or services we offer or provide through it.
- To allow you to participate in interactive features on our Website.
- In any other way we may describe when you provide the information.
- For any other purpose with your consent.
- SMS opt-in and phone numbers collected for SMS communication purposes will not be shared with any third party and affiliates for marketing purposes

DISCLOSURE OF YOUR INFORMATION

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may disclose personal information that we collect or you provide as described in this Policy:

- To our subsidiaries and affiliates.
- To contractors, service providers, and other third parties we use to support our business.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of EYRA's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by EYRA about our Website users is among the assets transferred.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- With your consent.

We may also disclose your personal information:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce or apply our **Terms of Use** and other agreements.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of EYRA, our customers, or others.

CHOICES ABOUT HOW WE USE AND DISCLOSE YOUR INFORMATION

We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:

- **Tracking Technologies and Advertising.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe's website. If you disable or refuse cookies, please note that some parts of our Website may then be inaccessible or not function properly.
- **Promotional Offers from EYRA.** If you do not wish to have your personal information used by EYRA to promote our own services, you can opt-out by sending us an email stating your request to the email address provided in this Policy.

Data Security

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Website. Any transmission of personal information is at your own risk.

Changes to Our Privacy Policy

It is our policy to post any changes we make to our Policy on this page. If we make material changes to how we use or treat our users' personal information, we will notify you through a notice on the Website home page. The date the Policy was last revised is identified at the top of the page. You are responsible for periodically visiting our Website and this Policy to check for any changes.

Unenforceability

If any provision of this Policy is found to be unenforceable, then the unenforceable provision will be deemed superseded by an enforceable provision that most closely matches the intent of the original provision, and the remainder of this Policy shall continue in full force and effect.

Retention Period

We store and retain personal information you have provided for as long as necessary for your continued use of the Website and which we shall retain in compliance with applicable laws and regulations.

YOUR RIGHTS

Your rights under this Policy include the right to: (1) request access and obtain a copy of your personal information; (2) request rectification, removal, or deletion of personal information; (3) object to or restrict the processing of your personal information; and (4) request portability of your personal information. Additionally, if we have collected and processed your personal information with your consent, you have the right to withdraw or remove your consent at any time. The withdrawal or removal of your consent shall, however not affect the lawfulness of processing based on your consent before its withdrawal or removed.

To exercise any of your rights under the GDPR and CCPA, you may send us an email in the email address provided in this Policy. We may require additional information from you to process your request. Please note that we may retain information as necessary to fulfill the purpose for which it was collected and may continue to do so even after a data subject request in accordance with our legitimate interests.

Your data protection rights are not absolute and we may deny you your rights in accordance with the applicable data protections laws by providing you with the reason(s) for the denial of your request.

Our Data Protection Officer is constantly reviewing compliance with current Data Protection legislation regarding this Policy. If you desire to exercise any of your rights outlined in this Policy, please contact data@eyraadvisors.com, who will respond to your inquiry promptly and free of charge.

CONTACT INFORMATION

To ask questions or send comment(s) about this Policy and our privacy practices, contact us at:

EYRA LLC

295 Palmas Inn Way 104-399
Humacao, PR, 00791

(509) 768-2249

info@eyraadvisors.com

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This Policy has been drafted in compliance with all current regulations on Data Protection. This Policy will be considered effective upon its publication on the Website.

[1] The GDPR defines “personal data” as any information related to an identified or identifiable natural person. Under the CCPA, “personal data” pertains to information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household.

If we limit the audience to US residents, we can use this “Our Website is offered and available to users who are 18 years of age or older and reside in the United States or any of its territories or possessions.”