

ELFF Website Privacy and Cookie Policy

Effective Date: Nov. 1, 2018

The Equipment Leasing & Finance Foundation (ELFF) believes in your right to privacy when using the Internet for your communication. This Privacy Policy describes how ELFF collects, uses, discloses, transfers, stores, retains or otherwise processes your information when you (whether you are a person or business) access or use in any manner any ELFF services (including, but not limited to through a digital receipt or ELFF Invoice, at a point of sale, using our Online Store, registering for a conference, event, meeting or webinar) through ELFF's website or applications (collectively, "Services"); or otherwise contact or interact with us, even if you have not applied or signed up for a ELFF account or other Service or downloaded one of our applications.

This Privacy Policy applies to your use of our Services, and covers information collected in connection with your access to and use of our Services. Please read this Privacy Policy carefully. By continuing to interact with our Services, you are consenting to the practices described in this Privacy Policy.

Our Privacy Policy Explains:

- What information we collect about you
- How we use your information
- When and with whom we share your information
- How long we retain your information
- Cookies policy and other tracking technologies
- Third-party advertising and analytics
- Your Rights
- Security
- California Privacy Rights
- Changes to this privacy policy
- Contact

WHAT INFORMATION WE COLLECT

1. Information You Provide to Us Directly

ELFF may collect different information from or about you depending on the manner in which you use our website. The following examples are provided to help you better understand the information We may collect through your use of the ELFF website.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier.

- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We will collect any information you provide to us directly such as the following:

In order to use certain features of the ELFF website, such as creating a profile, purchasing a publication or registering for a meeting, you are required to create an Account, and in that case, we will collect and store any personal information you provided to us, such as first name, last name, company name, company address, phone, fax, e-mail address, and payment and billing information.

Information Received Through Third-Party Platforms:

You may access the ELFF website through Third-Party Platforms, such as Facebook. If you use our ELFF website on or through a Third-Party Platform, including via any mobile and/or other Internet connected devices (“Wireless Devices”), or click on third-party links, the collection, use, and disclosure of your information and your use of the ELFF website will also be subject to the privacy policies and other terms of such third parties or Third-Party Platforms. You should review such privacy policies, terms, and other agreements.

2. Information We Collect Through Automated Means

Technical and Usage Data

When you access the ELFF website, we collect certain information by automated means. This information may include without limitation: (a) technical information about your computer or Wireless Device, such as Your IP address, device type, operating system type and version, unique device ID, browser, browser language, domain and other systems information, platform types (collectively, “Technical Information”); and (b) usage statistics about your interaction with the E:FA website, including pages accessed, time spent on pages, pages visited, search queries, click data, date and time, and other information regarding your use of the ELFF website (collectively, “Usage Data”).

This Technical Information and Usage Data, which may be linked to your information, is collected through the use of server logs and tracking technologies, including: (i) cookies, which

are small pieces of code that websites send to your computer or Wireless Device to uniquely identify your browser or mobile device or to store information in your browser setting; and (ii) web beacons, which are small objects that allow us to measure the actions of visitors using the ELFF website. For more detailed information regarding how we use cookies and other technology, please review the additional information in this Privacy Policy under the Section entitled "Our Cookies Policy."

Geolocation Information: IP addresses received from your browser or device may be used to determine your approximate location, such as the city, state and/or country associated with an IP address.

HOW WE USE YOUR INFORMATION

We may use information about you for a number of purposes, including:

Providing, Improving, and Developing Our Services

- Reviewing and analyzing user browser and wireless device technical information;
- Reviewing user activity across the ELFF website (for example, ELFF analyzes trends and user traffic and usage information to identify determine the performance of content, research reports or events);
- Processing or recording payment transactions or money transfers;
- Otherwise providing you with the ELFF products and features you choose to use;
- Displaying your historical transaction or appointment information;
- Providing, maintaining, and improving our Services;
- Developing new products and Services;
- Delivering the information and support you request, including digital receipts, invoices, and scheduling information;
- Improving, personalizing, and facilitating your use of our Services;
- Measuring, tracking, and analyzing trends and usage in connection with your use or the performance of our Services.

Communicating with You About Our Services

- Responding to questions or concerns;
- Sending you information we think you may find useful or which you have requested from us about our products, services and the industry we serve;
- Sending push notifications to your desktop or wireless device to provide updates on relevant resources and content, which can be managed through your computer or smartphone browser;
- Manage your account preferences, establish your profile and registration information;
- Conducting surveys and collecting feedback about our industry and Services.

Protecting our Services and Maintaining a Trusted Environment

- Enforcing our Terms of Service or other applicable agreements or policies;

- Verifying your identity;
- Complying with any applicable laws or regulations, or in response to lawful requests for information from the government or through legal process;
- Fulfilling any other purpose disclosed to you in connection with our Services;
- Analyze trends and user traffic, track purchases and usage information;
- Contacting you to resolve disputes and provide assistance with our Services.

Advertising and Marketing

- Marketing of our Services, events, research and products;
- Communicating with you about opportunities, products, services, contests, promotions, discounts, incentives, surveys, and rewards offered by us and select partners;
- If we send you marketing emails, each email will contain instructions permitting you to “opt out” of receiving future marketing or other communications.
- If we obtain any Personal Information from you we will not sell it to third parties. It may be used internally as part of special merchandising and promotion programs and we may disclose non-personally identifiable compilations of information to third parties for marketing related purposes.

You can ask us or third parties to stop sending you marketing messages at any time by contacting us. To learn about your choices regarding interest-based advertising and cross-device tracking, please see below.

Digital Receipts

- If you provide ELFF with your contact information to receive receipts via email, we may store the email address or phone number you provide. We use your email address or phone number to send you a receipt for your purchase. Digital receipts may contain additional messages, offers, or links that may be of interest to you. For example, you may be able to submit feedback, or visit websites.

If you wish to opt out of receiving automatic digital receipts or change your preferences, please see below.

Other Uses

- For any other purpose disclosed to you in connection with our Services from time to time.

WHEN AND WITH WHOM WE SHARE YOUR INFORMATION

When and How We May Share/Disclose Your Information with Third Parties

We will share your information, which may include Registration Information, Profile Information, and Shared Content and Course Information, with the following third parties or under the following circumstances or as otherwise described in this Privacy Policy:

Third-party companies that perform services on our behalf may collect and store personal information you provide, such as first name, last name, company name, company address, phone, fax, e-mail address, payment and billing information, and credit card information. We may use third-party services for transactions such as payment processing, order fulfillment, data analysis, marketing services, advertising services (including but not limited to retargeted advertising), e-mail and hosting services, and customer services and support. We also These third-party service providers may access your personal information and are required to use it solely as directed by us for the purpose of our requested service.

We require all third parties to respect the security of your personal data. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

In addition, attendees at ELFF events authorize ELFF to share your contact information, including but not limited to email address and telephone number, with other registered attendees, sponsors and exhibitors.

Analytics and Data Enrichment Services

We use third-party analytics such as Google Analytics to help understand your usage of our services and to improve our Services.

Aggregate or De-identified Information

We may disclose or use aggregate or de-identified information for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data as this data does not directly or indirectly reveal your identity.

Social Media Features

The ELFF website may include social media features, such as the Facebook Like button. Our integration of these features may allow third-party social media provided to collect certain information such as your IP address, which page you are visiting when using Our Services, and to set a cookie to enable the feature to function properly. Your interactions with these features are governed by the privacy policy of the company providing it.

HOW LONG WE RETAIN YOUR INFORMATION

We generally retain your information as long as reasonably necessary to provide you the Services or to comply with applicable law, and in accordance with our document retention policy. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. We can retain copies of information about you and any transactions or Services in

which you may have participated for a period of time that is consistent with applicable law, applicable statute of limitations, or as we believe is reasonably necessary to comply with applicable law, regulation, legal process, or governmental request, to detect or prevent fraud, to collect fees owed, to resolve disputes, to address problems with our Services, to assist with investigations, to enforce other applicable agreements or policies, or to take any other actions consistent with applicable law.

In some circumstances we may anonymize your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you. This allows the specific information collected (name, email, address, phone number, etc.) to become anonymous, but allows ELFF to keep the transaction or engagement data. For example, ELFF will not be able to tell if John Smith registered for an event, but we will be able to tell that a person registered for an event and maintain headcount and transactional history. This will allow ELFF to maintain a level of information that helps us develop and improve our products and services.

COOKIES POLICY AND OTHER TRACKING TECHNOLOGIES

Like many online platforms, ELFF and its analytics vendors use server logs and automated data collection tools, such as browser cookies, pixel tags, scripts and web beacons. These tools are used for analytics purposes to enable ELFF to understand how Users interact with the ELFF services. ELFF and its analytics vendors may tie the information gathered by these means to the unique account ID of Users.

Cookies are small text files placed onto a computer or device while browsing the Internet. Cookies are used to collect, store and share bits of information about user activities. ELFF uses both session cookies and persistent cookies.

A session cookie is used to identify a particular visit to the ELFF services and collect information about interaction with the ELFF service. These cookies expire after a short time, or when the user closes their web browser after using the ELFF service. ELFF uses these cookies to identify a user during a single browsing session, such as when you log into the ELFF services. This helps ELFF improve the Service as well as improve the Users' browsing experience.

A persistent cookie will remain on a user's device for a set period of time specified in the cookie. ELFF uses these cookies to identify and recognize a specific user over a longer period of time. They allow ELFF to:

- analyze the usage of the ELFF services (e.g. what links users click on) in order to improve our offering
- test different versions of the ELFF services to see which particular features or content users prefer to optimize the ELFF services
- provide a more personalized experience to users with more relevant content and course recommendations and
- allow users to more easily log in to use the ELFF services. Persistent cookies include: preferences cookies to remember information about a user's browser and settings

preferences, such as preferred language. Preference cookies make user experience more functional and customized authentication and security cookies to enable a user to log in or stay logged in and access the ELFF service, to protect user accounts against fraudulent log-ins by others, and help detect, and protect against abuse or unauthorized usage of user accounts.

- functional cookies to make the experience of using the ELFF service better, like remembering the sound volume level selected by the user.

ELFF uses tracking technology to: (i) determine if a certain page was visited or whether an email sent by ELFF was opened or clicked on by a user; and (ii) to customize the learning experience of individual users by recommending specific courses and other content.

Cookie List

ELFF will retain the data of users for as long as instructed by the Customer. ELFF will delete certain or all personal data relating to users upon request of the Customer. ELFF may retain aggregated or anonymized data as set forth below.

Cookie Name	Service	Description	Expiration
_ga	Google Analytics	Used to distinguish users; typically for tracking user-level metrics in Analytics	2 years
_gid	Google Analytics	Same as _ga; used for shorter-term tracking such as returning visitors etc	1 day
gat[UA code]	Google Analytics	Used for rate-limiting tracked events in GA	1 minute
personalization_id	Twitter		2 years
lang	Twitter	Stores user's preferred language	Session
tfw_exp	Twitter		1 day
VISITOR_INFO1_LIVE	YouTube	Used and controlled by YouTube	~6 months
YSC	YouTube	Used and controlled by YouTube	Session
GPS	YouTube	Used and controlled by YouTube	~30 minutes
JSESSIONID	SearchBlox	Session identifier for SearchBlox	Session

User Preferences with respect to cookies and other tracking technologies

A user can set his or her web browser to notify about the placement of new cookies, limit the type of cookies or reject cookies altogether; if enabled, a user may not be able to use some or all of the features of the ELFF services (for example, may not be able to log in). General information about cookies and how to disable them can be found at www.allaboutcookies.org.

Most modern web browsers give you the option to send a Do Not Track signal to the websites you visit, indicating that you do not wish to be tracked. However, there is no accepted standard for how a website should respond to this signal, and we do not take any action in response to this signal. Instead, in addition to publicly available third-party tools, we offer you the choices described in this policy to manage the collection and use of information about you.

THIRD-PARTY ADVERTISING AND ANALYTICS

We can use third-party service providers to provide site metrics and other analytics services. These third parties can use cookies, web beacons, and other technologies to collect information, such as your IP address, identifiers associated with your device, other applications on your device, the browsers you use to access our Services, webpages viewed, time spent on webpages, links clicked, and conversion information (e.g., transactions entered into). This information can be used by ELFF and third-party service providers on behalf of ELFF to analyze and track usage of our Services, determine the popularity of certain content, and better understand how you use our Services. The third-party service providers that we engage are bound by confidentiality obligations and other restrictions with respect to their use and collection of your information.

This Privacy Policy does not apply to, and we are not responsible for, third-party cookies, web beacons, or other tracking technologies, which are covered by such third parties' privacy policies. For more information, we encourage you to check the privacy policies of these third parties to learn about their privacy practices. For more information about targeted advertising specifically, please visit www.aboutads.info/choices.

Examples of our third-party service providers to help deliver our Services or to connect to our Services include:

- Google Analytics: We use Google Analytics to understand how our Services perform and how you use them. To learn more about how Google processes your data, please visit <https://www.google.com/policies/privacy/>. To opt out of Google Analytics please visit <https://tools.google.com/dlpage/gaoptout>.
- Clear Vantage by Euclid: Clear Vantage is ELFF's Association Management Service (AMS) and is used to collect and store membership and contact details, event registration, store purchases and details about your interactions with ELFF so we can better serve our members and industry stakeholders.

These third-party service providers make use of cookies to implement their services.

YOUR RIGHTS

Under certain circumstances, you have rights in relation to your personal data. If you wish to exercise any of the rights set out below, please contact us. You have the right to:

Personal Information

You may access, change, or correct information that you have provided by making a request to us using the contact details below, in which case we may need to verify your identity before granting access or otherwise changing or correcting your information. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response. We try to respond to all legitimate requests within 30 days. Occasionally it may take us

longer than 30 days if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Do Not Track

Do Not Track (“DNT”) is an optional browser setting that allows you to express your preferences regarding tracking across websites. ELFF does not have a mechanism in place to respond to DNT signals. ELFF does track some activity across websites (including your search terms, the website you visited before you visited or used the Services and other clickstream data) and we may continue to collect information in the manner described in this Privacy Policy from web browsers that have enabled DNT signals or similar mechanisms.

Promotional Communications

You may opt out of receiving promotional messages from ELFF, if those messages, are powered by ELFF, by following the instructions in those messages. Opting out of receiving communications may impact your use of the Services. If you decide to opt out, we can still send you non-promotional communications, such as digital receipts that you request.

SECURITY

We take reasonable measures, including administrative, technical, and physical safeguards, to protect your information from loss, theft, misuse, and unauthorized access, disclosure, alteration, and destruction. Nevertheless, the internet is not a 100% secure environment, and we cannot guarantee absolute security of the transmission or storage of your information. We hold information about you both at our own premises and with the assistance of third-party service providers.

CALIFORNIA PRIVACY RIGHTS

California law permits residents of California to request certain details about our disclosure of your personal information by us to third parties for direct marketing purposes during the immediately preceding calendar year. If you are a California resident and would like to request this information, please contact us using the listing below.

CHANGES TO THIS PRIVACY POLICY

We may amend this Privacy Policy from time to time by posting a revised version and updating the “Effective Date” above. The revised version will be effective on the “Effective Date” listed. If you disagree with these changes, you may stop using our Services at any time. Your continued use of our Services constitutes your consent to any amendment of this Privacy Notice.

CONTACT

Please contact ELFF with any questions or concerns regarding this Privacy Notice.
Equipment Leasing & Finance Foundation
Attn: Paul Stilp
1625 Eye St NW, Suite 850

Washington, DC 20006

Email: pstilp@elfaonline.org

Phone: 202.238.3400

If you have any questions or concerns regarding our notice, or if you believe our notice or applicable laws relating to the protection of your personal information have not been respected, you may file a complaint with ELFF using the contact information listed above, and we will respond to let you know who will be handling your matter and when you can expect a further response. We may request additional details from you regarding your concerns and may need to engage or consult with other parties in order to investigate and address your issue. We may keep records of your request and any resolution.