

Privacy Policy

Sidecar Capital Management, LLC (“Sidecar”) understands the importance of protecting your personal and financial information when you visit our website located at www.sidecarcap.com (the “Website”).

The Website and all information submitted, transmitted or used in connection with the Website is located and shall for all purposes be deemed to be located and used exclusively within and sent or transmitted exclusively to the United States of America. If you do not agree to all of the terms, conditions, and practices set forth below, do not access the Website or any of its pages. Use of the Website or any of its functions other than to view this Privacy Policy for the first time is an acceptance of the terms, conditions, and practices described in this Website Privacy Policy.

WE RESERVE THE RIGHT TO CHANGE THIS WEBSITE PRIVACY POLICY AT ANY TIME FOR ANY REASON. WE SUGGEST THAT YOU REVIEW THIS POLICY PERIODICALLY FOR CHANGES. SUCH CHANGES SHALL BE EFFECTIVE IMMEDIATELY UPON POSTING. YOU ACKNOWLEDGE THAT BY ACCESSING OUR WEBSITE AFTER WE HAVE POSTED CHANGES TO THIS POLICY, YOU ARE AGREEING TO THIS WEBSITE PRIVACY POLICY AS MODIFIED.

Information Collection

The Website is capable of collecting certain information about persons who access the Website or attempt to use its account functions. Types of information that are or may be collected by the Website and uses of that information are set forth below. Sidecar is the sole owner of the information collected on the Website. Sidecar collects information from our users at several different points on our Website.

Transmission of email sent to us through our Website using our customer service web forms is “secure” by conventional industry standards; email otherwise sent by the Internet may not be secure. Please be aware that when you receive a receipt acknowledging your email, it means that the message has been routed into the Internet, and not that the message has been received by us. Sidecar may retain the content of any customer service web form or email that Sidecar receives, the email address from which it is sent, and our response. Content and other information related to e-mails sent by user to Sidecar may be used as testimonials or for other marketing purposes, except that no marketing communications unrelated to the subject matter of the submission will be sent to the e-mail address from which such e-mail or form is sent unless the user specifically elects to receive additional marketing materials or we obtain the e-mail address through another avenue that permits such use. In all cases, e-mail addresses may be compared to subscription or customer lists of Sidecar and its business partners.

When a user performs a search on a search engine within the Website, Sidecar may collect information regarding the search query and topic to assess areas of interest to users of the Website in general. Such information is not tied to individual identities in any way except that the query (or a record of location of results for the query) may be maintained on the user's computer by means of a cookie for the conveniences of the user. As necessary to provide service, Sidecar also may record information for every search request (disassociated from personally identifiable information) and use that information to solve technical problems with the service and to calculate overall usage statistics.

A cookie is a piece of data stored on the user's hard drive containing information about the user. The Website employs cookies, but will not use cookies to obtain data from your hard drive. Users can set their browsers or third party software to reject cookies. If a user rejects the cookie, it may be unable to use portions of our Website that require registration and the Website experience will not be capable of being tailored to the user from visit to visit. Cookies enable us to track and target the interests of our users to enhance the experience on our Website. These and similar types of information may also be collected by "web-bugs," or single-pixel gifs, and other means. Some of our business partners and advertisers may use cookies on our Website. We have no access to or control over these cookies.

We may use IP addresses and web server log files to analyze trends, administer the Website, track user's movement, and gather broad demographic information for aggregate use. Additionally, in areas of the Website requiring registration, we may use this information from time to time to police the Website for unregistered users (but Sidecar undertakes no obligation to do so). Information of this type may be combined with cookies or other sources of information for these purposes. Specifically, through the use of web server log files, any or all of the following information may be accessed, collected, analyzed, and stored during or after your visits to our Website: the name of the domain from which you access the Internet (for example, "aol.com" if you are connecting from an America Online account); the date and time you access our Website; the pages that you visit on our Website and the sequence in which you visit them; the amount of time that you spend on any given page of our Website; the Internet address of the Website that you visited immediately before visiting our Website; the Internet address of the Website from which you linked directly to our Website, if any; the Internet address of the Website that you visit immediately after leaving our Website; the type of operating system on your computer; the type of browser that you are using to view the Website. These and similar types of information may also be collected by "web-bugs," or single-pixel gifs and other means.

Information Use and Sharing

Sidecar maintains safeguards to guard each client's nonpublic personal information. Sidecar will use information collected on this Website for its own internal purposes, but Sidecar does not share any nonpublic personal information with any nonaffiliated third parties, except in the following circumstances:

- As necessary to provide a service that the client has requested or authorized, or to maintain and service the client's account (information may be provided to the firm's outside accounting firm, custodians and broker-dealers under this exception);
- As required by regulatory authorities or law enforcement officials who have jurisdiction over Sidecar, or as otherwise required by any applicable law; and
- To the extent reasonably necessary to prevent fraud and unauthorized transactions.

Links

The Website may contain links to other sites. Please be aware that Sidecar is not responsible for the terms of use or privacy practices of such other sites unless it is also the Website owned or controlled by Sidecar. We encourage our users to be aware when they leave our Website and to read the privacy policies of each and every website that collects personally identifiable information. This Website Privacy Policy applies solely to information collected by the Website on the domains owned and controlled by Sidecar.

Security

We take precautions to protect our users' information. When a user submits sensitive information via the Website, the information is protected both online and off-line as set forth in this section. All requests for financial and business sensitive information (to the extent such sensitivity is known), and all responses in the normal course thereto are encrypted and protected with the SSL encryption software. You can confirm that pages are encrypted by viewing the lock icon on the bottom of most browsers. We also take the measures off-line to protect your financial and known business sensitive information as we use to protect our own such information. Sidecar is not liable or responsible for the security of any information transmitted to the Website by you or for the disclosure of information due to errors in transmission.

Governing Law and Jurisdiction

By using our Website, you consent to the collection and use of information by Sidecar and others in accordance with this Privacy Policy. You also consent to the exclusive application of the laws of the state of New York and the United States of America to your access and use of the Website, including the submission of any information by you and the use of that information by Sidecar; and further, you waive application of the laws of any other jurisdiction to such access, use or submission of information in connection with the Website. Any dispute relating in any way to your use of the Website, the submission or use of any information in connection with the Website, or this Privacy Policy shall be subject to the exclusive jurisdiction and venue of the courts located in the City of Rochester, New York, USA.

Other Privacy Policies or Statements

This Website Privacy Policy provides a general statement of Sidecar's internet privacy policy. If you become a client of Sidecar, you may be provided with privacy policies or statements that supplement this policy.