

Privacy Policy

Gleason Capital Inc. provides this Privacy Policy to inform users of our policies and procedures regarding the collection, use, and disclosure of personally identifiable information received from users of this website, located at <https://www.gleasoncapitalinc.com> ("Site").

By using our Site, you consent to the processing of your information as outlined in this Privacy Policy, both now and as it may be amended in the future. "Processing" includes using cookies on a computer or interacting with information in various ways, such as collecting, storing, deleting, using, combining, and disclosing information, all of which will take place in the United States. If you reside outside the US, your personally identifiable information will be transferred to the US and processed and stored under US privacy standards.

By visiting our Site and providing information to us, you consent to this transfer and processing in the US.

Information Collection and Use

Our primary objectives in collecting personally identifiable information are to provide you with the products and services available through the Site, to communicate with you, and to manage your registered user account if you have one.

Information Collected Upon Registration

To access certain restricted sections of the Site, you will need to become a registered user and submit specific personally identifiable information to Gleason Capital Inc. This happens when you sign up for the Service or wish to receive marketing materials and information. Personally identifiable information that we may collect includes your IP address, full user name, password, email address, city, time zone, telephone number, and any other information you choose to provide.

Use of Contact Information

We may use your contact information to market our products and services, including our Service. If you decide at any time that you no longer wish to receive such communications, please unfollow us or follow the unsubscribe instructions provided in any of the communications.

Log Data

When you visit the Site, our servers automatically record information that your browser sends whenever you visit a website ("Log Data"). This Log Data may include information such as your IP address, browser type, the domain from which you are visiting, the web pages you visit, the search terms you use, and any advertisements on which you click. For most users accessing the Internet from an Internet service provider, the IP address will be different every time you log

on. We use Log Data to monitor the use of the Site and our Service and for the Site's technical administration. We do not associate your IP address with any other personally identifiable information to identify you personally, except in case of a violation of the Terms of Service.

Cookies

Like many websites, we also use "cookie" technology to collect additional website usage data and to improve the Site and our service. A cookie is a small data file that we transfer to your computer's hard disk. We do not use cookies to collect personally identifiable information. Gleason Capital Inc. may use both session cookies and persistent cookies to better understand how you interact with the Site and our Service, to monitor aggregate usage by our users and web traffic routing on the Site, and to improve the Site and our services. A session cookie enables certain features of the Site and our service and is deleted from your computer when you disconnect from or leave the Site. A persistent cookie remains after you close your browser and may be used by your browser on subsequent visits to the Site. Persistent cookies can be removed by following your web browser help file directions. Most Internet browsers automatically accept cookies. You can instruct your browser, by editing its options, to stop accepting cookies or to prompt you before accepting a cookie from the websites you visit.

Information Sharing and Disclosure

Service Providers

We engage certain trusted third parties to perform functions and provide services to us, including, without limitation, hosting and maintenance, billing, customer relationship management, database storage and management, and direct marketing campaigns. We will share your personally identifiable information with these third parties only to the extent necessary to perform these functions and provide these services, and only under binding contractual obligations requiring these third parties to maintain the privacy and security of your data.

Compliance with Laws and Law Enforcement

Gleason Capital Inc. cooperates with government and law enforcement officials or private parties to enforce and comply with the law. We may disclose any information about you to government or law enforcement officials or private parties as we, in our sole discretion, believe necessary or appropriate to respond to claims, legal processes (including subpoenas), to protect the property and rights of Gleason Capital Inc. or a third party, the safety of the public or any person, to prevent or stop any illegal, unethical, or legally actionable activity, or to comply with the law.

Business Transfers

Gleason Capital Inc. may sell, transfer, or otherwise share some or all of its assets, including your personally identifiable information, in connection with a merger, acquisition, reorganization, or sale of assets, or in the event of bankruptcy. You will have the opportunity to opt-out of any such transfer if the new entity's planned processing of your information differs materially from that set forth in this Privacy Policy.

Changing or Deleting Information

If you are a registered user of the Site, you may access and update or correct the information you provided to us. You can also submit a change by contacting us directly.

Security

Gleason Capital Inc. is very concerned about safeguarding the confidentiality of your personally identifiable information. We employ administrative, physical, and electronic measures designed to protect your information from unauthorized access. We will make any legally required disclosures of any breach of the security, confidentiality, or integrity of your unencrypted electronically stored personal data to you via email or conspicuous posting on this Site in the most expedient time possible and without unreasonable delay, consistent with (i) the legitimate needs of law enforcement or (ii) any measures necessary to determine the scope of the breach and restore the reasonable integrity of the data system.

Links to Other Websites

Our Site contains links to other websites. The fact that we link to a website is not an endorsement, authorization, or representation of our affiliation with that third party. We do not exercise control over third-party websites. These other websites may place their own cookies or other files on your computer, collect data, or solicit personally identifiable information from you. Other sites follow different rules regarding the use or disclosure of the personally identifiable information you submit to them. We encourage you to read the privacy policies or statements of the other websites you visit.

General Data Protection Regulation (GDPR)

Here you can find the official PDF of the Regulation (EU) 2016/679 (General Data Protection Regulation) as a neatly arranged website. All Articles of the GDPR are linked with suitable recitals. The European Data Protection Regulation is applicable as of May 25th, 2018, in all member states to harmonize data privacy laws across Europe. If you find the page useful, feel free to support us by sharing the project.

Compliance with Laws

We will disclose your Personal Data where required to do so by law or subpoena or if we believe that such action is necessary to comply with the law and the reasonable requests of law

enforcement or to protect the rights, property, or safety of Gleason Capital Inc., our users, or others. Residents of the European Union, the European Economic Area, and Switzerland who visit the Site or use the Service have the following legal data protection rights under the relevant legal conditions: right to information, right to erasure, right to rectification, right to access by the data subject (Article 15 GDPR), right to deletion (Article 17 GDPR), right to correction (Article 16 GDPR), right to restriction of processing (Article 18 GDPR), right to data portability (Article 20 GDPR), right to lodge a complaint with a supervisory authority (Article 77 GDPR), right to withdraw consent (Article 7 (3) GDPR), as well as the right to object to particular data processing measures (Article 21 GDPR). These users have the right of access to their Personal Data and may at any time unsubscribe from our newsletter.

Our Policy Towards Children

The Site is not directed to persons under 13. If a parent or guardian becomes aware that his or her child has provided us with personally identifiable information without their consent, he or she should contact us. We do not knowingly collect personally identifiable information from children under 13. If we become aware that a child under 13 has provided us with personally identifiable information, we will delete such information from our files.

Changes to This Policy

This Privacy Policy may be updated from time to time for any reason; each version will apply to information collected while it was in place. We will notify you of any material changes to our Privacy Policy by posting the new Privacy Policy on our Site. You are advised to consult this Privacy Policy regularly for any changes.