

Export Controls and Sanctions Advisors LLC ("ECS Advisors") Website Privacy Policy

Export Controls and Economic Sanctions

Export Controls refers to a collection of federal laws and regulations that, for reasons relating to national security, economic competitiveness, or implementation of trade sanctions against specific countries, limit the export of physical items, technology, data, and information out of the U.S. national security or economic reasons. This includes deemed export, which can occur when foreign nationals have access to materials in the U.S.

Economic Sanctions refers to commercial and financial penalties applied by states or institutions against states, groups, or individuals. Economic sanctions are a form of coercion that attempts to get an actor to change its behavior through disruption in economic exchange.

ECS Advisors Web Server Automatic Collections

- The IP address of the computer from which you visit our sites and, if available, the domain name assigned to that IP address;
- The type of browser and operating system used to visit our Web sites;
- The date and time of your visit;
- The Internet address of the Web site from which you linked to our sites; and
- The pages you visit.

Applicability

This Privacy Policy applies only to ECS Advisors' domains and explains our practices about the collection, use, and disclosure of visitor information.

Statement of Policy

Privacy is extremely important to us. Please read the following to understand our views and practices regarding this matter and how they pertain to you. ECS Advisors does not share information about individual visitors with any other party, except as disclosed below. ECS Advisors gathers user information in the following processes:

What Information We Collect

We and our third-party vendors collect certain information regarding your use of ECS Advisors, such as your IP address and browser type. Your session and the pages you

visit on ECS Advisors will be tracked, but we will not attempt to identify you individually. We may use your IP address to identify the general geographic area from which you are accessing ECS Advisors. We may also collect other information as described in this policy.

How Information is Used

We use the information we gather from you for administration purposes, abuse prevention, and to track user trends, and for the other purposes described in this policy. If you send us an email, the email address you provide may be used to send you information, respond to inquiries, and/or other requests or questions. We will not share, sell, rent, swap, or authorize any third party to use your email address for commercial purposes without your permission.

User information may be shared with third-party vendors to the extent necessary to provide and improve web services or other communications to users. We also use geographic, demographic, and interest-based reports of our website visitors to create custom audience lists. We prohibit any third parties who receive user information for this purpose from using or sharing user information for any purpose other than providing services for the benefit of our users.

We may also provide your information to third parties in circumstances where we believe that doing so is necessary or appropriate to satisfy any applicable law, regulation, legal process, or governmental request; or to detect, prevent or otherwise address fraud, security, or technical issues; or protect our rights and safety and the rights and safety of our users or others.

Cookies and Third-Party Services

Cookies are small files that are stored on your computer (unless you block them). We use cookies to understand and save your preferences for future visits and compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future. Google and other third parties may use cookies, pixels, web beacons, and similar technologies to collect or receive information from this website and elsewhere on the Internet and use that information to provide measurement services and target ads.

Opt-Out

You may disable cookies through your individual browser options, or you can opt out of the collection and use of this information.

Information from Children

ECS Advisors does not seek through the Site to gather personal data from or about minors (as this term is defined by applicable law).

Linking to Third-Party Sites

Pages on ECS Advisors often include links to third-party websites as a convenience to users. ECS Advisors does not control third-party websites and is not responsible for the content or privacy practices of any linked-to, third-party websites or any links within a third-party website.

Security

This site has reasonable security measures in place to help protect against the loss, misuse, and alteration of the information under our control. However, no method of transmission over the Internet or method of electronic storage is 100% secure.

By accessing this site, certain information about the User, such as Internet protocol (IP) addresses, navigation through the Site, the software used and the time spent, along with other similar information, will be stored on ECS Advisors or its website hosts servers. These will not specifically identify the User. The information will be used internally only for web site traffic analysis.

If the User provides unique identifying information, such as name, address and other information on forms stored on this Site, such information will be used only for statistical purposes and will not be published for general access. ECS Advisors, however, assumes no responsibility for the security of this information.

Data Protection and Privacy: Worldwide

There is no legal instrument dealing with the privacy of individuals on an international scale. Rather, there are territorial privacy laws which are applicable within certain countries or regions. These laws provide a legal framework on how to collect, use and store the personal data of natural persons.

ECS Advisors will use its best efforts to comply with international privacy laws including the EU General Data Protection Regulation (GDPR), EU ePrivacy Directive, California Consumer Privacy Act (CCPA), California Online Privacy Protection Act (CalOPPA), and the Personal Information Protection and Electronic Documents Act of Canada (PIPEDA). In the Asia Pacific Region, ECS Advisors is bound by several data privacy regulations including the Australian Privacy Principals (APP) contained in the Privacy Act 1988 (the “Privacy Act”), the Hong Kong Personal Data Privacy Ordinance (the “PDPO”) and the

Singapore Personal Data Protection Act (the “PDPA”)

ECS Advisors is committed to complying with the strategic export control and sanctions laws, privacy laws, regulations and procedures will use its best efforts to comply with spirit and general protections afforded in the laws of ECS Advisors’ website users’ jurisdiction.

POLICY ON EU-US DATA PRIVACY FRAMEWORK (DPF), UK EXTENSION TO THE EU-US DPF, AND SWISS-US DPF

EU-US DPF, UK Extension to the EU-US DPF, and Swiss-US DPF

ECS Advisors complies with the EU-U.S. DPF, the UK Extension to the EU-US DPF, and the Swiss-US DPF (collectively the “DPF”) as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the member countries of the European Union (EU), the European Economic Area (EEA), the UK, and Switzerland to the United States (“Personal Information”). If there is any conflict between the terms in this policy and the DPF Principles, the DPF Principles shall govern.

ECS Advisors’ participation in the DPF applies to personal data received from the EU/EEA, the UK, and Switzerland. ECS Advisors will comply with the DPF Principles in respect of such personal data. Some types of Personal Information may be subject to additional privacy-related requirements and policies, which are consistent with the DPF Principles. For example:

- Personal Information regarding and/or received from clients is also subject to any specific agreement with, or notice to, the client, as well as additional applicable laws and professional standards.
- Personal Information regarding ECS Advisors’ personnel is subject to internal human resource policies.
- Personal Information received via ECS Advisors’ websites is subject to this Web Privacy Policy.

Types of Personal Information Collected and Purpose for Collection

Personal Information from Client Engagements: ECS Advisors provides professional consulting services to its clients. ECS Advisors’ clients may send Personal Information to it for processing on their behalf as part of the consulting services they have purchased. For example, ECS Advisors may receive Personal Information such as name, email address, employment information, or financial data. ECS Advisors uses any such Personal Information to perform services for its clients and to administer and manage its relationships with its clients.

In the event that a client engagement involves a transfer of Personal Information from the EU to the United States, the relevant clients are responsible for providing appropriate notice, where required, to the individuals whose Personal Information may be transferred to ECS Advisors, including providing individuals with certain choices with respect to the use or disclosure of their Personal Information, and obtaining any requisite consent. ECS Advisors handles such Personal Information in accordance with its clients' instructions.

Personal Information from ECS Advisors Website Use: ECS Advisors may collect Personal Information when you choose to access and use ECS Advisors' websites.

GoDaddy: ECS Advisors Website Host

In addition to the above, ECS Advisors incorporates by reference additional protections and provisions contained in the Global Privacy Policy of its host, GoDaddy. <https://www.godaddy.com/legal/agreements/privacy-policy>

