

# Online Privacy Policy

Effective as of 02-05-2019

## Overview

Mesa West Capital (“us”, “our” or “we”), a subsidiary of Morgan Stanley, appreciates that you have provided us with your personal information and protecting that information is an important part of how we conduct our business. We believe it is important for you to know how we treat information about you that we may receive through this site (“Site” or “online services”), which is administered by Morgan Stanley. Please read this Privacy Policy carefully before using this Site.

This Online Privacy Policy describes how we collect information when you access or use our online services and how you can update and control the use of information provided through our online services, how we use, share and protect that information, and how you can update that information. This Online Privacy Policy does not apply to other information we collect, including information collected on other websites, such as separate websites operated by our affiliates or business partners that do not post this Online Privacy Policy, or other information you may provide to us through other means.

## Information Collected

We collect personal information you provide via forms, applications, surveys, documents or images you attach or upload, and other online fields. Examples of personal information we may collect include your name, postal or email addresses, telephone, and fax or mobile numbers. There are portions of our online services where we may collect personal information about you to fulfill your online requests (e.g. topics of interest).

When you visit our online services, we and companies we work with may track and collect information from the computer or mobile device you used to access our online services, including the following:

- Information about your device, such as your device model and manufacturer and Internet Protocol (IP) address of your device;
- Information about your browser, such as browser type and platform, operating system, and screen resolution; and
- Information about your browsing behavior, such as the link that brought you to our online services, any links clicked within our online services, the pages on our online services you visited, average time spent on these pages, and when they were visited.

Please see “Cookies and Other Tracking Technologies” below to understand how we collect some of the data described above. We, along with our service providers and business partners, use this data to calculate usage levels for our online services, diagnose problems, ensure that our online services function properly, and for the purposes described below under “Use of Collected Information.”

## Use of Collected Information

We may use information you provide us through our online services to:

- respond to your questions and requests;
- provide service support;
- manage institutional risk;
- assess your satisfaction with our services;
- contact you about updates to our online services;
- maintain measures aimed at detecting and preventing fraud and protecting the security of personal information and our online services;
- provide specified services to you;
- monitor the performance of our online services, diagnose problems and ensure that our online services function properly, make our online services easier and more convenient to use, and otherwise administer our online services;
- comply with laws, regulations, legal processes and law enforcement requirements; and
- otherwise operate our business, or any other purpose that complies with applicable laws and regulations.

## **How We Share Personal Information**

Any information we collect through your use of our online services may be shared with our service providers, financial institutions with whom we jointly offer financial products, our affiliates, or as permitted or required by law (such as credit bureau agencies, business we buy or sell assets from, and law enforcement or government agencies).

If we have information from you or information that is available from other sources, including from third parties from both offline and online sources, we may use it in combination with the information that we have collected through our online services. We can use this information to better tailor and personalize our services and communications to you, both online and offline, and for any other purpose that complies with applicable law and regulation.

We may also use and share data that we collect on an aggregate or anonymous basis (such that it does not identify any individual consumers) for various business purposes, where permissible under applicable laws and regulations.

## **Information about Cookies and Other Tracking Technologies**

We, our affiliates and/or other persons acting on our or their behalf use cookies and similar technology, such as web beacons (also known as clear GIFs or pixel tags), or similar technologies as they may develop over time. Cookies are small pieces of data sent from a website and stored on a device. Cookies may enable us to capture and compile statistical information about how you use our online services, including information relating to your device's IP address, the frequency of your visits, readership data (such as the average length of

visits, which pages are viewed or shared during a visit or other interactions with our content, such as time spent viewing videos, PDFs read and links clicked), authentication information, acceptance or rejection of website terms, and periods of inactivity. To learn more about cookies, including information on what cookies have been set on your device and how cookies can be managed and deleted, visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

We do not allow unaffiliated third parties to collect personal information about your activities on this Site. Nor do we serve ads promoting unaffiliated third party products or services on this Site. Please note that at this time, our Site does not respond to “do not track” signals.

## **Links to Other Websites**

This Online Privacy Policy only applies to the use and disclosure of information we collect through our online services. While we try to link only to websites that share our high standards and respect for privacy, we are not responsible for the content, security, or privacy practices employed by other websites, or links posted on our online services. Information you disclose to other parties or through such sites is subject to the privacy and security practices and policies of those parties or websites. We disclaim all liability, to the extent permissible, with regard to your access to such linked websites. Access to any other websites is at your own discretion and we encourage our users to read the privacy statements of each and every website or online services visited in order to learn how such third parties may treat your information.

## **International Users**

Our online services are United States-based and are controlled, operated and administered by Morgan Stanley from its offices within the United States of America, and are made available to you on an unsolicited basis, without any marketing or promotion regarding these online services to you from Mesa West or its personnel. This Online Privacy Policy is provided in accordance with and subject to applicable U.S. law. If you decide to continue to access our online services from your location outside the United States, you hereby agree that your use of those services is subject to this Online Privacy Policy and your personal information will be transferred or processed in the United States.

## **Protecting Children’s Privacy Online**

Our online services are not directed to or intended for individuals under 18 years of age.

## **Changes to this Online Privacy Policy**

We reserve the right to modify or supplement this Online Privacy Policy at any time. Therefore, we recommend that you review this Online Privacy Policy, updated and posted on this Site, regularly for changes. The Effective Date of this Online Privacy Policy, as stated above, indicates the last time this Online Privacy Policy was revised.

Your continued use of our online services after we have changed the Online Privacy Policy signifies your acceptance of the revised terms. Under certain circumstances (i.e., with respect to material changes to this Online Privacy Policy), we may also elect to notify you through additional means, such as by posting a notice on the Site or sending you an email.