

## **Soleil Securities Group, Inc. Website Privacy Policy**

**Effective Date: September 1, 2009**

### **Scope**

This Privacy Policy covers Soleil Security Group, Inc.'s ("Soleil") treatment of information collected via its web site with the URL [www.soleilgroup.com](http://www.soleilgroup.com) (the "Soleil Website") and when users use our research database services.

This policy does not apply to the practices of companies that Soleil does not own or control, or to individuals that Soleil does not employ or manage, including operators of sites to which users may link from the Soleil Website. This policy also does not apply to any offline collection of personally identifiable information or the treatment of the same when such information is collected outside of the Soleil Website.

### **What Information Soleil Collects**

Currently we only collect information about users' usage of the various information services available within the Soleil Website, including statistics that we gather about unique visits, referring URLs, repeat visits and page views.

[Similar to other commercial web sites, the Soleil Website utilizes standard technology called "cookies" and web server logs to collect information about how the Soleil Website is used. Cookies are a feature of web browser software that allows web servers to recognize the computer used to access a web site. Cookies are small pieces of data that are stored by a user's web browser on the user's hard drive. Information gathered through cookies and web server logs may include the date and time of visits, the pages viewed, time spent at the Soleil Website, and the web sites visited just before and just after the Soleil Website. Users can, of course, disable cookies on their computers by indicating this in the preferences or options menus in their browsers. However, it is possible that some parts of the Soleil Website will not operate correctly if cookies are disabled. Users should consult with their browsers' provider/manufacture if they have any questions regarding disabling cookies.]

In the event that we allow users to register on the Soleil Website to access our research database, we will collect information about users which users choose to share with us in registration.

Soleil may also collect certain personal information about you whenever you send an email to Soleil via the email addresses provided on the Soleil Website.

### **What Information Soleil Discloses to Third Parties**

Currently we do not collect nonpublic personal information from our users. In the event that we do, however, we would have no intention to disclose nonpublic personal information we collect except as required by law or to cooperate with regulators or law enforcement authorities, and we would take appropriate security measures to protect such nonpublic personal information. In addition, in the event that we began collecting nonpublic personal information, we might disclose such nonpublic personal information among our affiliated companies and to other companies that offer services with us or on our behalf. In such case, we would require that all entities with which we share nonpublic personal information, including companies that process or service transactions for us, to agree to keep such information confidential. We also would prohibit them from using or disclosing users' information except for the limited purpose and to the persons for whom disclosure was intended, or as otherwise required by law.

We do not intend to sell users' personal information to third-party marketers or any other entity for any purpose without users' consent.

### **Changes to the Soleil Privacy Policy**

Soleil may amend this policy from time to time. If we make any substantial changes in the way we use users' personal information we will notify users by posting a prominent notice in our privacy policy or in other locations on the Soleil Website.

### **How to Contact Us about Our Privacy Policy**

If you have questions about our privacy policy or the information we collect on the Soleil Website, or you wish to make sure that the information we have is accurate and updated, you may contact us as follows:

Soleil Securities Group, Inc.  
360 Madison Avenue  
Third Floor  
New York, NY 10017  
T: (212) 380-4800  
F: (212) 380-4802