

**ATHENA ART FINANCE CORP.  
PRIVACY POLICY FOR WEBSITE USERS AND MAILING LIST RECIPIENTS**

Athena Art Finance Corp. (“AAF” or “we”) is strongly committed to protecting the privacy of your personal information, and this Privacy Policy explains how AAF treats your personal data when you use this website (“the website” or “the site”). By using the site and submitting any personal data, you agree to the use by AAF of such data in accordance with this Privacy Policy.

**Data Controller**

The data controller for your personal data is AAF, 400 Park Avenue, 12th Floor, New York, New York 10022. If you have questions or comments about this Privacy Policy, please contact us at [privacy@athena-art.com](mailto:privacy@athena-art.com).

**Data Collection and Use**

We process your personal data for the purpose for which it was provided and/or for the legitimate purpose of direct marketing. Specifically, AAF collects the following types of personal data for the following purposes:

Information you provide directly to us. We collect personal data which is specifically and voluntarily provided by visitors to AAF's website, such as name, job title, and company name, address, email address, telephone and fax numbers, from website visitors. A visitor may choose to provide personal data in the following examples:

- Subscribe or order newsletters and/or publications;
- Submit resumes or work history information;
- Participate in "join our mailing list" initiatives;
- Participate in bulletin boards, discussion or message forums;
- Register for events and conferences;
- Contact us for further information;
- Visiting our site while logged into a Social Media platform.

Visitors are also able to send email to AAF through the site. Their messages will contain the user's email address, as well as any additional information the visitor may wish to include in the message. AAF's intention is not to seek any sensitive information through our website unless legally required. Sensitive information includes a number of types of data relating to: race or ethnic origin; political opinions; religious or other similar beliefs; trade union membership; physical or mental health; sexual life or criminal record. We suggest that you do not provide sensitive information of this nature. If you choose to provide sensitive information for any reason, AAF accepts your explicit consent to use that information in the ways described in this privacy statement or as described at the point where you choose to disclose this information.

We process personal data you provide to us for the purpose for which it was provided and to provide you with details of our services and events which may be of interest to you, as described further below.

Usage Information. We may use internal or third-party analytics tools for our own analytics purposes, to help us measure traffic and usage trends for the site. These tools collect information sent by your browser or the website that assists us in improving the site. We collect and combine this information with analytics information from other visitors such that it cannot reasonably be used to identify you or any other individual.

Information collected from third parties. We may receive information about you from third parties who may have collected and transferred your personal data to us in accordance with their own privacy policies and/or

terms of use. Examples of such third parties include social media networks, business partners, advertising networks, or analytics providers. Where we receive such information from third parties, we may combine it with the other personal data that we have collected about you as set out above and use such information either alone or in combination with the other personal data we hold for the purposes outlined in this Privacy Policy.

Cookies. AAF uses Google Analytics and cookies to collect information about how our website is used. A cookie is small file placed on a visitor's computer or device when you visit our website. We use persistent analytical and performance cookies to allow us to recognize and count the number of users and to see how users move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are readily finding the information they seek from AAF. Specifically, we use the following types of cookies for the following purposes:

Cookie	Purpose	Type	Duration
_ga	This cookie is set to allow AAF to track individual visitors and their use of the site. It is set when you first visit the site and updated on subsequent visits. AAF does not use Google Analytics to collect personal information, other than IP address, from our visitors.	Persistent	2 years from set/update
_gat	This cookie is set to allow AAF to track individual visitors and their use of the site. It is set when you first visit the site and updated on subsequent visits. AAF does not use Google Analytics to collect personal information, other than IP address, from our visitors.	Persistent	2 years from set/update

Site activity information collected by analytics providers is not combined with personal information held by AAF. You can learn more about Google Analytics privacy policy and how to opt-out of analytics cookies by clicking on following link:

Google Analytics: <http://www.google.com/analytics/learn/privacy.html>

You may delete cookies in your browser and you can also block cookies from being placed by activating the setting on your browser that allows you to refuse the setting of all or some cookies. You may refuse or delete one or more cookies and still access our website. After you finish browsing our website, you may delete site cookies from your system if you wish.

Log Files. In order to properly manage our website we also anonymously log information on our operational systems (such that it cannot reasonably be used to identify you or any other individual) and identify categories of visitors by items such as domains and browser types. These statistics are reported in the aggregate to our webmaster. We use this information to analyze usage of the website and to improve the site.

### **Sharing Information with Third Parties**

Personal data collected by AAF may be transferred or disclosed to third party contractors, subcontractors, subsidiaries and/or other AAF firms for the purposes for which the visitor has submitted the information and for the administration of our system or site. Personal data may also be transferred to third party service providers including website hosting and management, data analysis, data backup, security and storage

services. As a result, personal data may be transferred outside the European Economic Area to countries whose laws may not provide adequate production for your personal data. Prior to your personal data being shared with such affiliates or third parties (as applicable), we will take contractual or other steps reasonably necessary to ensure that your personal data is treated securely by such affiliates or third parties in accordance with this Privacy Policy.

We may disclose information to third parties under the following circumstances:

- As required by applicable law, statute, rule, regulation or professional standard, or through subpoena, search warrant or other legal process;
- For regulatory compliance purposes;
- When you have given us consent to share personal data;
- When required to deliver publications or reference materials requested by a visitor;
- When required to facilitate conferences or events hosted by a third party;
- If we sell or buy any business or business assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
- Of we or substantially all our assets are acquired, in which case personal data held by us will be one of the transferred assets;
- When we engage third parties to perform services on our behalf in relation to the site;
- Or otherwise as set out in this statement.

### **Third Party Links**

Athena-art.com may link to other websites which do not operate under AAF's privacy practices. When you link to other websites, AAF's privacy practices no longer apply. We encourage visitors to review each site's privacy policy before disclosing any personally identifiable information.

### **Communications**

We may use your data to contact you via email with information about AAF's business, services and events, and other information which may be of interest to you. AAF may also use your information in order to administer and manage the site or communicate with you about the site. You may unsubscribe from our marketing mailing list at any time by clicking the "unsubscribe" link in our communication to you, or by contacting us at [privacy@athena-art.com](mailto:privacy@athena-art.com).

Our website does not collect or compile personal data for dissemination or sale to outside parties for consumer marketing purposes, or host mailings on behalf of third parties.

### **Data Retention**

The personal data you submit to us will only be retained for as long as is required for the purposes for which it was collected, or for so long as we are required by law to do so. Contact information about visitors such as mailing list information is kept until a user unsubscribes to a publication or requests that we delete that information. When personal data is no longer necessary for us to retain, it will be deleted or made anonymous in a safe and permanent manner or access to it will be blocked to the extent that statutory data retention requirements apply.

### **Your Rights and Access**

You have a number of rights in relation to how we process your personal data. These include the right to:

- Be informed about any personal data held about you by us;
- Request access to your personal data;
- Request us to have any inaccurate personal data amended or erased;
- Request us to restrict processing of the personal data on certain grounds;
- Receive a copy of your personal data in a machine-readable format and have it sent to another company;
- Object to the processing of your personal data on certain grounds; and
- File a complaint with the relevant supervisory authority if you think we have violated data protection laws.

If you have any concerns or complaints about how we handle your personal data, or to exercise your rights, please contact us at [privacy@athena-art.com](mailto:privacy@athena-art.com).

Inquiries about the accuracy of personal data previously submitted to AAF through its website, or requests to have outdated information removed, should be directed to: [privacy@athena-art.com](mailto:privacy@athena-art.com). AAF is committed to providing reasonable and practical access to visitors to allow them the opportunity to identify and correct any inaccuracies. When requested and practical, AAF will delete identifying information from current operational systems.

When personal data is retained, AAF assumes responsibility for keeping an accurate record of the information once a visitor has submitted and verified the data. AAF does not assume responsibility for verifying the ongoing accuracy of the content of personal data. When practically possible, if AAF is informed that any personal data collected through a website is no longer accurate, AAF will make appropriate corrections based on the updated information provided by the authenticated visitor.

### **Security**

AAF has implemented generally accepted standards of technology and operational security in order to protect personal data from loss, misuse, alteration or destruction. Only authorized AAF personnel are provided access to personal data and these employees have agreed to maintain the confidentiality of this information.

### **Children**

AAF understands the importance of protecting children's privacy, especially in an online environment. The AAF site covered by this privacy statement are not intentionally designed for or directed at children under the age of 18 years. It is AAF's policy never to knowingly collect or maintain personal information about children under the age of 18. If you are a parent or guardian and believe that we may have inadvertently collected personal data from your child without your consent, please notify us immediately by sending an email to [privacy@athena-art.com](mailto:privacy@athena-art.com) and we will promptly delete such personal data.

### **Modifications**

AAF may update this Privacy Policy publishing an updated version here. If we make any material changes to the Privacy Policy, we will let you know, by posting a notice on the website or sending an email notifying users of the changes. You can access the most current version of this privacy statement at any time on this site.