

## WEBSITE PRIVACY POLICY

OneGI (“OneGI,” “we,” “us,” or “our”) is providing this website privacy policy (the “Policy”) to help you understand the personal information that we collect, use, and disclose (“process”) in connection with your use of this website, which can be found at <https://onegi.com/> (the “Site”), and your rights with respect to that information.

This Policy applies only to personal information processed in connection with this website. It does not apply to personal information we collect or otherwise process via other means to provide our services to our clients. That processing is subject to a separate privacy notice provided at or before the point of collection.

The Site includes links to other websites controlled by unaffiliated entities. Please note that information you provide to these other entities is subject to those entities’ respective privacy policies, over which we have no control.

### Categories and Sources of Personal Information We Collect

We collect the following categories of personal information about you:

- **Identifiers**, such as name, address, email address, and telephone number.
- **Internet and electronic network activity**, such as your IP address, device identifiers, the type of computer, operating system, and Internet browser that you use to access the Site, and your engagement behavior, such as buttons or links you click on the Site or information you type or enter into forms on the Site.

These categories of personal information come from the following sources:

- Information you provide via the Site or in your communications over the Site.
- Information automatically collected by cookies, web beacons, and other tracking technologies when you interact with the Site.

### Categories of Entities To Whom We May Disclose Personal Information

We may disclose the above categories of personal information about you to the following types of entities for a business purpose:

- **Affiliated entities**, such as the general partners to the various funds which Webster advises.
- **Service providers** that maintain our customer database or help create, host, maintain, and analyze traffic to the Site.
- **Regulatory authorities or law enforcement** as may be requested or required by law.

*No mobile information will be shared with third parties/affiliates for marketing/promotional purposes. All the above categories exclude text messaging originator opt-in data and consent; this information will not be shared with any third parties.*

Webster does not sell your personal information; Webster shares the categories of personal information identified above as necessary to operate and enhance the Site and improve your experience, to contact and communicate with you in response to your inquiry, or as permitted or required by applicable law.

### Security

We maintain physical, electronic, and procedural safeguards, such as permitting only authorized employees, who are trained in the proper handling of client information, to have access to that information. We also ensure that unaffiliated entities who have access to personal information about our clients agree to maintain appropriate standards of security and confidentiality that meet or exceed applicable law. Despite these measures, the Internet, nor systems and databases connected to it, are 100% secure, and we cannot and do not guarantee the security of your information, particularly when transmitted over the Internet.

## Cookies

We use cookies to operate and administer our Site, gather usage data on our Site, and improve your experience on it. A “cookie” is a piece of information sent to your browser by a website you visit. Cookies can be stored on your computer for different periods of time. Some cookies expire after a certain amount of time, or upon logging out (session cookies), others survive after your browser is closed until a defined expiration date set in the cookie (as determined by the third party placing it), and help recognize your computer when you open your browser and browse the Internet again (persistent cookies). For more details on cookies please visit [All About Cookies](#).

## Site Analytics

We use Google Analytics, a web analytics service provided by Google, Inc. (“Google”). Google Analytics uses cookies to help us analyze how users use the Site and enhance your experience when you use the Site. For more information on how Google uses this data, go to [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/).

## Your Choices

It is important that the information we have about you is complete, up to date and accurate. Please contact us using the information provided below if you would like to correct or update your information or, where permitted by law, request access to your information.

## Rights for California Residents

To the extent provided for by law and subject to applicable exceptions and exemptions, California residents have the following rights in relation to the personal information we collect:

- The right to know what personal information we have collected and how we have used and disclosed that personal information;
- The right to request deletion of your personal information;
- The right to opt out of the sale of your personal information (please note that we do not sell your personal information); and
- The right to be free from discrimination relating to the exercise of any of your privacy rights.

**Exercising Your Rights:** California residents can exercise the above privacy rights by contacting OneGI by email at [compliance@onegi.com](mailto:compliance@onegi.com).

**Verification:** In order to protect your personal information from unauthorized access or deletion, we may ask you to provide additional personal information for verification. If properly verified, Webster will deliver the requested information in a portable and readily useable format, to the extent feasible. If we cannot verify your identity, we will not provide or delete your personal information.

**Authorized Agents:** You may submit a request to know or a request to delete your personal information through an authorized agent. If you do so, the agent must present signed written permission to act on your behalf and you may also be required to independently verify your identity with us.

## Children’s Information

This Site is not intended for children under the age of 16. We do not knowingly collect personal information from any person under the age of 16. If you believe we have collected personal information from a child who is under 16 years old, please let us know and we will delete it.

## **Changes to This Privacy Policy**

Any changes we may make to this Policy will be posted on this page, unless otherwise required by applicable law. Please check back frequently to see any updates or modifications.

## **Contact Us**

If you have questions about this Policy or need to access this Policy in a different format, please contact us at:

Email: [info@onegi.com](mailto:info@onegi.com)

Address: 215 Centerview Drive, Suite 263, Brentwood, TN 37027

Effective Date: March 1, 2021