

## PRIVACY POLICY

iCross Fund, Inc., (“iCross”, “us”, or “we”) provides a technology platform located at [www.iCross.com](http://www.iCross.com) (“Platform” or “Site”) for prospective investors to independently search and invest in securities offerings on the Site. As explained below, we collect information from users (“you”, “your”, or “User”) in various ways when you interact with our Site. By using our Site, you consent to our collection and use of information as explained in this Privacy Notice and agree to be bound by our [Terms of Use](http://www.icrossfund.com/assets/documents/termsfuse.pdf) (<http://www.icrossfund.com/assets/documents/termsfuse.pdf>).

### Collection of Information

iCross collects non-personally identifiable information from you regarding your usage of our Site (“Non-Personally Identifiable Information”). Non-Personally Identifiable Information may include, without limitation, Site pages viewed, websites visited before visiting the Site, frequency of visits, clickstream data, browser type, operating system, organization name, internet connection speed, presentations and videos viewed, time spent viewing pages of our Site or using certain features of our Site, demographic data such as server locations, clickstream data, location services, server location, cookies existing on your computer, search criteria used and results, date and time of access or visits to our Site, frequency of visits to our Site, connection speed, and other information which does not specifically identify you. We collect this information using various technologies (some of which are described below), including, but not limited to, cookies, web beacons, web session variables, server log files, clear gifs, browser plug-ins or add-ons, or Javascript. “Cookies” are pieces of information that may be placed on your computer by a Site for the purpose of facilitating and enhancing your communication and interaction with that Site. A “web beacon” is typically a transparent graphic image (usually 1 pixel x 1 pixel) that is placed on a website or in an email which allows a website to record the simple actions of the User opening the page that contains the beacon. “Server logs” can be either a single log file or several log files automatically created and maintained by a server of activity performed by the server, which can include information about any transaction you conduct with the server.

iCross also collects personal information from you (“Personally Identifiable Information”) when you sign up for an account, send us an email through the Site, sign up for or purchase a service through the Site, or make an investment through the Site. Personally Identifiable Information refers to non-public information that personally relates to or identifies you (such as your name, password, age and date of birth, gender, email address, postal mailing address, home/mobile telephone number, Social Security number and/or taxpayer identification number, credit card number, Internet protocol (“IP”) address, investment objectives, investment experience, assets and income, and other similar information, or other information you provide or upload to the Site such as photographs, answers to questionnaires or surveys, or responses filled in on blank forms by you made available on the Site). We request that you provide us with personal information, including, but not limited to, your personal or company social media profile, demographic information, financial information about issues (i.e. valuations, share prices, fundraising goals), financial information about individuals (i.e. net worth, bank account information) and other information requested from time to time. We may also collect and store information, which could include Non-Personally Identifiable Information or Personally Identifiable Information, locally on your computer or device using mechanisms such as browser web storage or application data caches. However, not all Non-Personally Identifiable Information and Personally Identifiable Information, such as credit card numbers or social security numbers, is stored.

We may use analytics programs and service providers, such as Google Analytics, which can use first party cookies to report on your interactions with the Site. Google Analytics collects information including, but not limited to, the time of each of your visits to the Site, whether you have visited the Site before, what website referred you to the Site, and what pages you viewed on the Site.

This Privacy Policy does not cover the collection of information by cookies or other methods by such Third Party Services or other third parties, such as our business partners. We do not control how these Third Party Services or third parties collect information or by what means such Third Party Services or third parties may use their own cookies to collect information about you.

### **Use of Information**

iCross will use information you provide consistent with this Privacy Notice. iCross will use information you provide to us, including Non-Personally Identifiable Information or Personally Identifiable Information, to better serve you and enhance your experience with the Site, among other things. This may include having to modify or copy such Non-Personally Identifiable Information or Personally Identifiable Information, or other information such as images or textual content you provide, in order to provide you with a seamless and enjoyable experience.

Toward these ends, you consent to our use and disclosure of any information submitted to us via the Site, or information collected when you access the Site in any manner, and you acknowledge that you have no expectation of privacy, confidentiality or privilege in such information.

iCross may use Non-Personally Identifiable Information and Personally Identifiable Information: (1) to market our products and services to you; (2) to provide services and products requested by you; (3) to serve advertisements on our Site; (4) to enable our vendors and contractors to provide and assist us in the marketing, operation, troubleshooting and analysis of our Site and other services; (5) to analyze data to send more targeted messages to you or other Users of our Site; (6) to conduct research and analyze data to improve our products, services, and Site; (7) to deliver email messages like special offers, updates, newsletters, customer service, and service announcements; (8) to verify User information; (9) to comply with and meet any regulatory requirements for the offer or sale of securities required by law, rules or regulations to our affiliates or members; (10) to protect our Site or its Users; (11) to engage in any other lawful activities we believe are consistent with the foregoing; and (12) when required by law or to protect against legal liability. We may provide any of these services through third parties, which may necessitate sharing Non-Personally Identifiable Information or Personally Identifiable Information with them.

iCross may make your information, including Non-Personally Identifiable Information or Personally Identifiable Information, available on its Site and visible to other Users of or visitors to the Site. For instance, subject to certain preferences and permissions as to visibility you will be allowed to make, information you provide about yourself in response to questionnaires on our Site may be made available to others such as information concerning your status as an accredited investor. As such, other Users of our Site may be able to personally identify you based on your information made available on our Site. As a further example, if you utilize Third Party Services to log into our Site, other Users to whom you may be connected to through such Third Party Service may be able to view or follow information about you, including Non-Personally Identifiable Information or Personally Identifiable Information, on our Site.

iCross may employ or contract other third parties, companies, or individuals to perform certain functions or services on its behalf. Examples of these services from such third parties, companies, or individuals, may include ID verification, electronic document signing, payment storing and processing, sending postal mail and e-mail, escrow services, disbursement of funds, analyzing data, providing marketing assistance, and providing customer service. As such, these third parties, companies, or individuals may have access to your information, including Non-Personally Identifiable Information or Personally Identifiable Information, needed to perform their functions or services, and may not use it for other purposes.

iCross may also use and disclose Personally Identifiable Information and Non-Personally Identifiable Information to help us to carry out certain internal functions such as information management, account processing, client services, or other data collection relevant to our business; to investigate and help prevent potentially unlawful activity or activities that threaten the integrity of our Site or network; to protect and defend our rights or property or the rights or property of others; as required by courts or administrative agencies; and in connection with a financing, sale, merger, or reorganization of iCross' business or assets. Any successor in interest to our business would acquire the information we maintain, including Personally Identifiable Information, and may alter the terms of this Privacy Notice.

iCross does not and will not sell any of your information, including Non-Personally Identifiable Information or Personally Identifiable Information, to any third party for purposes of advertising, soliciting, or telemarketing. We may, however, have to disclose your information, including Non-Personally Identifiable Information or Personally Identifiable Information, to other companies or entities in the event that iCross may be sold or is sold to another company or entity. In that case, your information, including Non-Personally Identifiable Information or Personally Identifiable Information, may be sold or transferred to such acquiring company or entity.

### **Third Party Sites and Services**

The Site contains links to other websites and services not maintained by iCross. In addition, other websites and services may also reference or link to the Site. We encourage you to be aware when you enter or leave our Site, or surf the Internet, and to read the privacy statements of each website and service that you visit. We do not endorse, screen, or approve, and are not responsible for the privacy practices or the content of, other websites or services.

### **Messaging**

The Site permits Users to communicate with companies and other Users posting information on the Site. We may read, collect and analyze information transmitted between Users for regulatory compliance and marketing purposes. However, as explained in our Terms of Use, we rely on the affirmations of investors that they are "Accredited Investors" as defined in the Terms of Use. We do not guarantee that information provided by Site visitors or investors is accurate or complete. iCross assumes no liability or responsibility for any errors or omissions in the content of its Site.

### **Opt-out Policy**

We may at times send you e-mail communications with marketing or promotional materials. If you prefer not to receive such marketing or promotional e-mails from us, you may unsubscribe completely by emailing us at: [info@iCross.com].

Please note that opt-out requests may take up to [five (5) business days] to process. Please also note that at times we may need to send you e-mail communications that are transactional in nature such as service or termination announcements or payment confirmations which are communications you will not be able to opt-out of.

You will be able to modify the information concerning your account by visiting your profile page and editing any information you wish to change. You will be able to view and change your e-mail address, password, financial information, contact information, or other login information by visiting your account's settings page subject to our Site policy. If you wish to delete your account or need help modifying account information, please contact us at [info@iCross.com]. We will require up to [five (5) business days] to process such requests.

Through your account settings you will be able to set certain preferences and permissions regarding the visibility of your information, including Non-Personally Identifiable Information or Personally Identifiable Information, to others. You may stop or restrict the placement of iCross' cookies, Google's cookies and third party cookies on your computer by adjusting your web browser preferences or a "Do Not Track" setting in your web browser. If you do so, you may still use our Site, but this may interfere with some of its functionality.

You may also clear cookies from your computer via your web browser settings. You may also wish to use a Google Analytics opt-out web browser add-on. Information on this option is available at:

<http://support.google.com/analytics/bin/answer.py?hl=en&answer=2700409>

If you would like us to remove your Personally Identifiable Information from our database, please send a request to: [info@iCross.com].

We are not responsible for removing your Personally Identifiable Information from the lists of any Third Party Services or other third party who has previously been provided your information in accordance with this Privacy Notice.

## **Security**

We use reasonable efforts to secure access to Personally Identifiable Information in our possession, but will not be liable for any failure to safeguard such information, whether inadvertent or otherwise. Personally Identifiable Information is also stored with third parties who have informed us that they also use reasonable efforts to secure access to Personally Identifiable Information, but we will not be liable for the failure of any third party to safeguard Personally Identifiable Information, whether inadvertent or otherwise.

We protect the security of your information during transmission by using Secure Sockets Layer (SSL) software, which encrypts information you input. Wherever appropriate, we obfuscate and/or encrypt information in our systems and/or during information transfer.

We utilize third party service providers who may store on their servers social security numbers, addresses, financial information, electronic signatures, and payment information. For your security, we only display only the last four digits of your bank account information when confirming an investment.

It is important for you to protect against unauthorized access to your password and to your computer. Be sure to log off when finished using a shared computer.

## **Children's Privacy Policy**

The Site is not intended for use by children, especially those under eighteen (18) years of age. No one under eighteen (18) years of age is allowed to use the Site, provide any personal information or receive our email distributions. We do not knowingly solicit or collect Personally Identifiable Information from children under the age of thirteen (13) or anyone under eighteen years of age. If you believe that a minor has disclosed Personally Identifiable Information to iCross, please report this to us immediately by emailing us at: [info@iCross.com].

## **Changes to This Privacy Notice**

We reserve the right, in our sole discretion, to change, modify, add, or remove portions of this Privacy Notice at any time. Any changes or updates will be effective immediately upon posting to our Site. You should review this Privacy Notice regularly for changes, and can determine if changes have been made by checking the Effective Date below. Your continued use of our Site following the posting of any changes to this Privacy Notice means you accept such changes.

## **Applicable Law and Jurisdiction**

The Site is maintained in the United States of America. By accessing the Site, you consent to and authorize the export of Personally Identifiable Information to the United States of America and its storage and use as specified in this Privacy Notice.

This Privacy Notice shall be governed by, construed and entered in accordance with the laws of the State of New York applicable to contracts deemed to be made within such state, without regard to choice of law or conflict of law provisions thereof. All disputes with respect to this Privacy Notice shall be brought and heard either in the New York State Courts located in Queens County, or the federal district court for the Eastern District of New York. You consent to the in personam jurisdiction and venue of such courts. YOU HEREBY WAIVE YOUR RIGHT TO A TRIAL BY JURY WITH RESPECT TO ANY CLAIM, ACTION OR PROCEEDING, DIRECTLY OR INDIRECTLY, ARISING OUT OF, OR RELATING TO, THIS AGREEMENT TO THE FULLEST EXTENT PERMITTED BY LAW.

## **Effective Date**

This Privacy Notice was last updated on June 22, 2015