



Privacy Policy

This Privacy Policy ("**Policy**") is effective as of November 9, 2023. This Policy describes the types of information that WLJ Advisors, LLC, a Virginia limited liability company d/b/a Disruption Advisors ("**Disruption Advisors**", "**we**", "**our**", or "**us**") may collect from you ("**you**" or "**your**") or that you may provide ("**Personal Information**") on scurvetool.com and thedisruptionadvisors.com (collectively, the "**Websites**") and any of its related products and services (collectively, "**Services**"), and our practices for collecting, using, maintaining, protecting, and disclosing that Personal Information. It also describes the choices available to you regarding our use of your Personal Information and how you can access and update it.

This Policy is a legally binding agreement between you and Disruption Advisors. If you are entering into this Policy on behalf of a business or other legal entity, you represent that you have the authority to bind such entity to this Policy, in which case the terms "you" or "your" shall refer to such entity. If you do not have such authority, or if you do not agree with the terms of this Policy, then you must exit the Websites immediately and cease all access and use of the Websites and Services. By accessing and using the Websites and Services, you acknowledge that you have read, understood, and agree to be bound by the terms of this Policy. This Policy does not apply to the practices of companies that we do not own or control, or to individuals that we do not employ or manage.

You acknowledge and agree that this Policy does not apply to any Personal Information you choose to make public.

Information We Collect

We collect and maintain personally identifiable information and automatic information. We will collect the following data:

Full name
Email address
Phone number
Physical address

We also collect data to communicate with our clients in case they have any questions regarding our Services. To exercise your right to know or your right to delete, please email us at support@thedisruptionadvisors.com. Please include in your request:

Full name and address
Former names (if applicable)
Contact information (Phone number or email address)
Your relationship to us (e.g., former or existing client)

Please indicate if you are acting as a representative of another individual. If that is the case, include the identification information both for yourself and for the individual you represent and a copy of the written authorization you have received.

Automatic Collection of Information

When you open the Websites, our servers automatically record information that your browser sends. This data may include but is not limited to information such as your browser type and version, operating system type and version, language preferences, geographic location, the webpage you were visiting before you came to the Websites, pages of the Websites that you visit, the time spent on those pages, information you search for on the Websites, access times and dates, and other statistics.

Information collected automatically is used only to identify potential cases of abuse and establish statistical information regarding the usage and traffic of the Websites and Services. This statistical information is not otherwise aggregated in such a way that would identify you in particular.

Internet Protocol Address

All computers and servers on the Internet use Internet Protocol (“IP”) addresses to recognize and communicate with each other. We collect and maintain IP addresses to administer and analyze our Websites and report aggregate information.

We may associate your IP address with your personally identifiable information and may maintain, use, and disclose such information in accordance with the terms of this Policy.

Privacy of Children

We do not knowingly collect any Personal Information from people under the age of 18. If you are under the age of 18, do not submit any Personal Information through the Websites. If you have reason to believe that a person under the age of 18 has provided Personal Information to us through the Websites, please contact us to request that we delete that person’s Personal Information.

We encourage parents and legal guardians to monitor their children’s Internet usage and to help enforce this Policy by instructing their children never to provide Personal Information through the Websites or Services without their permission. We also ask that all parents and legal guardians overseeing the care of children take the necessary precautions to ensure that their children are instructed to never give out Personal Information when online without their permission.

Use and Processing of Personal Information

We act as a data controller and a data processor when handling Personal Information, unless we have entered into a data processing agreement with you in which case you would be the data controller and we would be the data processor.

Our role may also differ depending on the specific situation involving Personal Information. We act in the capacity of a data controller when we ask you to submit your Personal Information that is necessary to ensure your access and use of the Websites and Services. In such instances, we are a data controller because we determine the purposes and means of the processing of Personal Information.

We act in the capacity of a data processor in situations when you submit Personal Information through the Websites and Services. We do not own, control, or make decisions about the

submitted Personal Information, and such Personal Information is processed only in accordance with your instructions. In such instances, you are the data controller.

In order to make the Websites and Services available to you, or to meet a legal or regulatory obligation, we may collect and use certain of your Personal Information. If you do not provide the Personal Information that we request, we may not be able to provide you with the requested products or Services. Any of the Personal Information we collect from you may be used for the following purposes:

- Send administrative information
- Respond to inquiries and offer support
- Improve user experience
- Protect from abuse and malicious users
- Respond to legal or regulatory requests and prevent harm
- Run and operate the Websites and Services
- Communicate with you regarding our Websites and Services
- Send you advertisements, promotions, and information about us generally

How we process your Personal Information depends on how you interact with the Websites and Services, where you are located in the world and if one of the following applies: (i) you have given your consent for one or more specific purposes; (ii) provision of Personal Information is necessary for the performance of an agreement with you and/or for any pre-contractual obligations thereof; (iii) processing is necessary for compliance with a legal obligation to which you are subject; (iv) processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in us; (v) processing is necessary for the purposes of the legitimate interests pursued by us or by a third party. We may also combine or aggregate some of your Personal Information in order to better serve you and to improve and update our Websites and Services.

Disclosure of Personal Information

We may share your Personal Information with our affiliates, contracted companies, and service providers (collectively, “**Service Providers**”) who we rely upon to assist in the operation of the Websites and Services available to you and whose privacy policies are consistent with ours or who agree to abide by our policies with respect to Personal Information. Service Providers will be provided access to Personal Information to the extent necessary to perform their functions.

We may also disclose any Personal Information we collect, use or receive if required or permitted by law, such as to comply with a subpoena or similar legal process, and when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request.

In the event of a sale of Disruption Advisors or a sale of some of all of our assets, Personal Information may be one of the business assets transferred or sold.

Retention of Personal Information

We will retain and use your Personal Information for the period necessary to provide you with the Services, comply with our legal obligations, to enforce our agreements, resolve disputes, unless a longer retention period is required or permitted by law.

We may use any aggregated data derived from or incorporating your Personal Information after you update or delete it, but not in a manner that would identify you personally. Once the retention period expires, Personal Information shall be deleted. Therefore, the right to access, the right to erasure, the right to rectification, and the right to data portability cannot be enforced after the expiration of the retention period.

Cookies

The Websites use Cookies. “**Cookies**” are small text files that allow websites to store and retrieve information about you from your computer system. We serve Cookies to track individual site usage for later aggregation and for other purposes explained in this Policy. You are always free to decline our Cookies if your browser permits, but you may not be able to take full advantage of our Websites’ features if you do.

Data Analytics

Our Websites may use third-party analytics tools that use Cookies, web beacons, or other similar information-gathering technologies to collect standard internet activity and usage information. The information gathered is used to compile statistical reports on user activity such as how often users visit our Websites, what pages they visit and for how long, etc. We use the information obtained from these analytics tools to monitor the performance and improve our Websites and Services. We do not use third-party analytics tools to track or to collect any personally identifiable information of our users and we will not associate any information gathered from the statistical reports with any individual user.

Do Not Track Signals

Some browsers incorporate a Do Not Track feature that signals to websites you visit that you do not want to have your online activity tracked. Tracking is not the same as using or collecting information in connection with a website. For these purposes, tracking refers to collecting personally identifiable information from consumers who use or visit a website or online service as they move across different websites over time. How browsers communicate the Do Not Track signal is not yet uniform. As a result, the Websites are not yet set up to interpret or respond to Do Not Track signals communicated by your browser.

Social Media Features

Our Websites may include social media features, such as the Facebook and Twitter buttons, “Share This” buttons, etc. (collectively, “**Social Media Features**”). These Social Media Features may collect your IP address, what page you are visiting on our Websites, and may set a cookie to enable Social Media Features to function properly. Social Media Features are hosted either by their respective providers or directly on our Websites. Your interactions with these Social Media Features are governed by the privacy policy of their respective providers.

Email Marketing

We offer electronic newsletters to which you may voluntarily subscribe at any time. We will maintain the information sent via e-mail in accordance with applicable laws and regulations.

In compliance with the CAN-SPAM Act, all e-mails sent from us will clearly state who the e-mail is from and provide clear information on how to contact the sender. You may choose to stop

receiving our newsletter or marketing emails by following the unsubscribe instructions included in these emails or by contacting us.

Links to other resources

The Websites may contain links to other resources that are not owned or controlled by us. Please be aware that we are not responsible for the privacy practices of such other resources or third parties. We encourage you to be aware when you leave our Websites and to read the privacy statements of each and every resource that may collect Personal Information.

Information Security

We use reasonable efforts to protect your Personal Information from unauthorized use or disclosure. Unfortunately, information transmitted on the Internet and/or stored on systems attached to the Internet are not 100% secure. As a result, we do not ensure, warrant, or guarantee the security or integrity of such information. We will not be responsible for disclosure of any information (including Personal Information) due to errors in transmission or the unauthorized acts of third parties.

Data Breach

In the event we become aware that the security of the Websites has been compromised or your Personal Information has been disclosed to unrelated third parties as a result of external activity, including, but not limited to, security attacks or fraud, we reserve the right to take reasonably appropriate measures, including, but not limited to, investigation and reporting, as well as notification to and cooperation with law enforcement authorities. In the event of a data breach, we will make reasonable efforts to notify affected individuals if we believe that there is a reasonable risk of harm to the user as a result of the breach or if notice is otherwise required by law.

Changes and Amendments

We reserve the right to modify this Policy or the terms related to the Websites and Services at any time at our discretion.

An updated version of this Policy will be effective immediately upon the posting of the revised Policy unless otherwise specified. Your continued use of the Websites and Services after the effective date of the revised Policy (or such other act specified at that time) will constitute your consent to those changes. However, we will not, without your consent, use your Personal Information in a manner materially different than what was stated at the time your Personal Information was collected.

Contacting Us

If you have any questions, concerns, or complaints regarding this Policy, the information we hold about you, or if you wish to exercise your rights, we encourage you to contact us at support@thedisruptionadvisors.com.

