



Ashcroft Capital SMS Privacy Policy

SMS Privacy Policy

Ashcroft Capital LLC (“Ashcroft”) is committed to protecting your privacy. This Standard Messaging Service Privacy Policy (the “SMS Policy”) governs how we treat the Personal Information that we collect and receive from you in connection with your use of the SMS Service (“Service”), which we make available to you through a third-party service provider. This Policy is incorporated into the Terms of Service.

By using the Service, you agree to the terms of this SMS Policy. Ashcroft Capital reserves the right, in its sole discretion, to modify or change this SMS Policy at any time with or without prior notice to you. The date of the last update will be posted at the bottom of this SMS Policy for your convenience. This SMS Policy, and any changes, are effective as soon as provided. Your continued use of the Service following the posting of any changes to the SMS Policy constitutes your full acceptance of those changes.

“Personal Information” is information that individually identifies you, such as your mobile phone number or user/screen name, as well as the any Personal Information that you choose to include in messages you send through the Service.

What Personal Information is collected about you:

Through the use of the Service, Ashcroft Capital will receive the following information from our third-party service provider: your mobile phone number when you send a text message to us, the text of messages that you send to other users of the Service, any user or screen name that you select in connection with the Service, as well as any comments or feedback regarding the Service that you send to us.

How Ashcroft Capital uses Personal Information about you:

We use Personal Information to (a) provide you with the Service, (b) process and respond to inquiries, (c) improve the Service, (d) if necessary, contact you with important announcements or messages, (e) conduct research, and (f) provide anonymous reporting for internal and external clients and partners.

Each message that you send through the Service (either to us or to other users of the Service) is stored on our servers. We retain these messages on our servers. Ashcroft Capital utilizes servers and services owned by third parties.

Disclosure of your information:

We will not rent or sell your Personal Information to other companies or individuals unless we have your consent. We may use or disclose such information in any of the following limited circumstances:

- We have your consent.
- We provide such information to trusted businesses or persons for the sole purpose of processing Personal Information on our behalf. When this is done, it is subject to agreements that oblige those parties to process such information only on our instructions and in compliance with this Policy and appropriate confidentiality and security measures. If the third party fails to comply with our terms, Ashcroft Capital is not accountable in any way for any liability or reimbursement.
- We provide such information to third parties who have entered into non-disclosure agreements with us.
- We provide such information to a company controlled by, or under common control with, Ashcroft Capital for any purpose permitted by this Policy.
- We respond to subpoenas, court orders, or legal process, or to establish or exercise our legal rights, or the legal rights of others, or defend against legal claims.
- We believe it is necessary to share Personal Information to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of Ashcroft Capital's Terms of Service, or as otherwise required by law.
- We transfer Personal Information about you if Ashcroft Capital is, or its assets are, acquired by or merged with another company.

We may share aggregated information with others without further notice. An example of this would be the number of people who used the Service in a given month or the total number of texts sent in a given week.

Security:

Ashcroft Capital takes precautions to ensure the security of your Personal Information, including ensuring that our third-party service providers protect the security of your Personal Information. However, we cannot guarantee that hackers or unauthorized personnel will not gain access to your Personal Information despite our efforts. You should note that in using the Service, your information will travel through third party infrastructures which are not under our control (such as a third-party SMS delivery platform or your carrier network).

We cannot protect, nor does this Policy apply to, any information that you transmit to other users. You should never transmit personal or identifying information to other users.

Opting in:

A mobile user might opt-in by:

- Entering a phone number online through the investor portal and selecting the option to opt-in to receiving SMS; or
- Signing up with an Ashcroft Capital Representative;
- Texting “START” to 1-833-765-7949
- Texting “UNSTOP” to 1-833-765-7949 to resubscribe after unsubscribing.

Opting out:

Ashcroft Capital’s third-party service provider gives you the ability to opt out of the Service for any reason. You can opt out by texting “STOP” or “UNSUBSCRIBE” to +1-833-765-7949.

We reserve the right to send you certain communications relating to the Service, such as announcements and administrative messages, without offering you the opportunity to opt-out of receiving them.

Children:

The Service is not intended for children under 18, and Ashcroft Capital does not knowingly collect information from children under the age of 18.

By using the Service, you are representing that you are at least 18.

Intended audience:

Ashcroft Capital requires that users of this service be limited to U.S. residents only.

Questions or concerns?

If you have any additional questions regarding this Policy, please feel free to contact us any time by emailing marketing@ashcroftcapital.com

SMS Terms of Service

Use of the **Ashcroft Capital** text message-based services (the “Service”) is subject to the following Terms of Service. These terms constitute a legal agreement (the “Agreement”). Please read them carefully.

1. Ashcroft Capital will allow different opportunities, such as a entering a phone number online through our investor portal, to opt-in to SMS services.
2. You can cancel the Service at any time. Just text “STOP” or “UNSUBSCRIBE” to +1-833-765-7949. After you send the SMS message “STOP” to us, we will send you an SMS message to confirm that you have been unsubscribed. After this, you will no longer receive SMS messages from us. If you want to join again, just sign up as you did the first time, and we will start sending SMS messages to you again.
3. If at any time you forget what keywords are supported, just text “HELP” to +1-833-765-7949. After you send the SMS message “HELP” to us, we will respond with instructions on how to use our Service as well as how to unsubscribe.
4. We are able to deliver messages to the following mobile phone carriers. Major carriers: AT&T, Verizon Wireless, Sprint, T-Mobile, MetroPCS, U.S. Cellular, Alltel, Boost Mobile, Nextel, and Virgin Mobile. Minor carriers: Alaska Communications Systems (ACS), Appalachian Wireless (EKN), Bluegrass Cellular, Cellular One of East Central IL (ECIT), Cellular One of Northeast Pennsylvania, Cincinnati Bell Wireless, Cricket, Coral Wireless (Mobi PCS), COX, Cross, Element Mobile (Flat Wireless), Epic Touch (Elkhart Telephone), GCI, Golden State, Hawkeye (Chat Mobility), Hawkeye (NW Missouri), Illinois Valley Cellular, Inland Cellular, iWireless (Iowa Wireless), Keystone Wireless (Immix Wireless/PC Man), Mosaic (Consolidated or CTC Telecom), Nex-Tech Wireless, NTelos, Panhandle Communications, Pioneer, Plateau (Texas RSA 3 Ltd), Revol, RINA, Simmetry (TMP Corporation), Thumb Cellular, Union Wireless, United Wireless, Viaero Wireless, and West Central (WCC or 5 Star Wireless). ***Carriers are not liable for delayed or undelivered messages***
5. As always, message and data rates may apply for any messages sent to you from us and to us from you, and Ashcroft Capital is not liable for the cost of any such messages. You will receive recurring messages. If you have any questions about your text plan or data plan, it is best to contact your wireless provider. For all questions about the Service provided by this short code, you can send an email to marketing@ashcroftcapital.com
6. You understand that anyone with access to your mobile phone may be able to view the messages you receive when using the Service, and you agree that Ashcroft Capital will not be liable to you if this occurs.
7. You understand that you are not required to consent to the Service to receive any other services from Ashcroft Capital.

8. By agreeing to these Terms of Service and providing us with your mobile phone number when you opt into the Service, you authorize Ashcroft Capital to contact you by text message at your mobile phone number using an automatic telephone dialing system or device, or any other computer assisted technology as applicable.
9. If you have any questions regarding privacy, please read our **Privacy Policy**.