# **OCM Gold Fund Online Privacy Policy**

# Scope

OCM Gold Fund ("OCM Gold Fund," "we," or "us") respects your concerns about privacy and values the relationship we have with you. This Online Privacy Policy applies to information collected through websites operated by OCM Gold Fund, including those websites operated by our affiliates unless otherwise indicated on such websites (collectively, the "Sites"), from or about visitors to, or users of, the Sites, and describes our practices for collecting, using, disclosing, transferring, retaining, and protecting such information. This Online Privacy Policy does not apply to information collected by us offline or through any other means.

#### **Information We Obtain**

OCM Gold Fund may obtain personal information from you through the Sites, including but not limited to information you provide when you:

- request, register for, subscribe to, order, or download any product, service, or newsletter;
- contact OCM Gold Fund with questions or requests for information; or
- complete a survey or poll.

For purposes of this Online Privacy Policy, "personal information" means information that can be used to identify you, such as your name, address, e-mail address, phone number, financial information, investor type, and assets under management.

## **Collection of Information Using Cookies and Other Tools**

OCM Gold Fund may use "cookies," web server logs, web beacons, or other electronic tools to collect information such as:

- IP address;
- browser type;
- operating system;
- computer platform;
- information about your mobile device;
- geo-location data; and
- the state or country from which you accessed the Sites.

OCM Gold Fund may also use cookies, web server logs, web beacons, or other electronic tools to collect and compile statistical and other non-personal information about your use of the Sites and the services provided on the Sites, such as:

- the web pages you visit on the Sites;
- the date and time of your visit;
- the number of links you click within the Sites;

- the functions you use on the Sites;
- the databases you view and the searches you request on the Sites;
- the data you save on, or download from, the Sites, etc.; and
- the websites you visited immediately before and after visiting the Sites.

A cookie is a small text file placed on your computer. Most browsers are set to accept cookies by default. If you prefer, you can usually set your browser to disable cookies, or to alert you when cookies are being sent. Likewise, most mobile devices allow you to disable the ability for geolocation information to be collected from your mobile device. The help function on most browsers and mobile devices contains instructions on how to set your browser to notify you before accepting cookies, disable cookies entirely, or disable the collection of geo-location data. You need to set each browser, on each device you use to surf the Web. Thus, if you use multiple browsers (e.g., AOL, Safari, Internet Explorer, Firefox, Chrome, etc.), you should repeat this procedure with each one. Similarly, if you connect to the Web from multiple devices (e.g., work and home), you need to set each browser on each device. However, if you disable cookies or refuse to accept a request to place a cookie, it is possible that some parts of the Sites, such as certain areas of the Sites for which you need to log in, will not function properly, and the advertising you receive when you visit the Sites may not be advertisements tailored to your interests.

OCM Gold Fund reserves the right to place advertising on the Sites. When such advertising is placed on the Sites, OCM Gold Fund, our service providers, or third-party advertisers or their advertising servers may also place or recognize unique cookies on your computer or use other electronic tools in order to help display advertisements that you may see on the Sites or on other websites. Information about your visits to, and activity on, the Sites and other websites, an IP address, the number of times you have viewed an advertisement, and other such usage information may be used, alone or in combination with other information, to display on your device screen advertisements that may be of particular interest to you. We may use Web beacons, provided by third-party advertising companies, to help manage and optimize our online advertising and product performance. Web beacons enable us to recognize a browser's cookie when a browser visits the Sites, and to learn which banner ads bring users to the Sites. The use and collection of your information by these third-party service providers, and by third-party advertisers and their advertising servers, is not covered by this Online Privacy Policy.

OCM Gold Fund does not process or respond to web browsers' "do not track" signals or other similar transmissions that indicate a request to disable online tracking of users who visit the Sites. For information about online behavioral advertising networks and how to "opt out" of advertising cookies placed by the Network Advertising Initiative's ("NAI") member networks, and thereby limit the tracking of your online activity and the targeted advertising you may receive, please <a href="click here">click here</a>. Note that even if you opt out of cookies placed by the NAI member networks, you may still receive online advertising. You can also prevent website tracking by changing the settings in your web browser settings as described above to disable cookies permanently or to alert you when cookies are being sent so you can refuse them at that time.

### **How We Use Your Information**

OCM Gold Fund uses the information collected through the Sites for purposes such as:

- to enhance your experience with the Sites;
- to save your preferences and account information;
- to provide you with the services, products, or information that you request;
- to communicate with you (e.g., about updates to your accounts, products, or services, or to provide information about products or services in which you have indicated an interest);
- to combat fraud or any other criminal activity;
- to fulfill any other purpose for which you provided the information;
- to conduct research and analysis (e.g., analyze and compile statistics about your use of the Sites and other websites, and produce data analytics and reports containing only anonymous and aggregate information that we may share with third parties for their own use); and
- to provide information, special offers, and promotions to you regarding products and services offered by us, our affiliates, or nonaffiliated third parties.

To assist us with the uses described in this Online Privacy Policy, information we have collected from or about you through the Sites, including your use of the Sites, may be combined with or enhanced by other information about you that we have from other online or offline sources, including from our service providers.

## **How We Share Your Information**

OCM Gold Fund may share your personal information with our affiliates and subsidiaries for their own marketing and other purposes. We may share your personal information with nonaffiliated third parties, including:

- with our service providers that help us to operate our business (e.g., to deliver the information, products, or services requested by you; to perform other activities related to such information, services, and products, including billing and collection; and to provide you with special offers or promotions from OCM Gold Fund);
- in connection with any proposed or actual sale or other transfer of some or all assets of OCM Gold Fund, and/or any proposed or actual sale or merger of OCM Gold Fund or any division of OCM Gold Fund (including in the event of a reorganization, dissolution or liquidation);
- to comply with legal orders (e.g., a subpoena or court order), government or law enforcement requests, or other legal process;
- to produce relevant documents or information in connection with litigation, arbitration, mediation, adjudication, government or internal investigations, or other legal or administrative proceedings;
- if OCM Gold Fund determines in its good faith judgment that such disclosure is necessary to provide its services or to protect the rights, interests, safety, or property of its business, employees, suppliers, customers, or others;
- to enforce any legal notices, terms of service, or agreements on or related to the Sites;

- to enforce the terms of any other agreement with OCM Gold Fund;
- to operate OCM Gold Fund systems properly;
- as otherwise required or permitted by law; and/or
- any other sharing to which you consent.

We may also share your personal information with nonaffiliated third parties, such as Google Analytics, that use technologies such as cookies, web server logs and web beacons to help us analyze how visitors use the Sites. The information collected through these means (including IP address) is disclosed to these service providers, who use the information to evaluate use of the Sites. To learn more about Google Analytics and how to opt out, please visit <a href="https://www.google.com/analytics/learn/privacy.html">www.google.com/analytics/learn/privacy.html</a>.

#### **Your Choices**

You can unsubscribe or choose not to receive promotional materials from OCM Gold Fund by following the specific instructions in the e-mail or other communication you receive or by e-mailing us at <a href="Info@OCMGoldFund.com">Info@OCMGoldFund.com</a>. All e-mail requests must include the following information: first name, last name, and e-mail address. Please note that it may take some time to process your request, consistent with applicable law.

## **How We Protect Personal Information**

We maintain administrative, technical and physical safeguards designed to protect the personal information you provide against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use.

# **Accessing and Updating Your Personal Information**

To access, review, rectify, delete or object to the processing of personal information collected about you through the Sites, please contact us at <a href="mailto:Info@OCMGoldFund.com">Info@OCMGoldFund.com</a>. All e-mail requests must include the following information: first name, last name, and e-mail address. While we will make reasonable efforts to accommodate your request, we also reserve the right to impose certain restrictions and requirements on such access requests, if permitted or required by applicable laws. To help protect your privacy and maintain security, we may take steps to verify your identity before granting you access to the information.

# **Links To Third-Party Websites**

The Sites may include links to third-party websites. Since we do not control third-party websites and are not responsible for any information you may provide while on such sites, we encourage you to read the privacy policies on those websites before providing any of your information on such sites.

# **Questions Regarding This Online Privacy Policy**

If you have questions regarding this Online Privacy Policy, please contact us at Info@OCMGoldFund.com.

# **Modifications To This Online Privacy Policy**

OCM Gold Fund reserves the right to change this Online Privacy Policy at any time by posting revisions on this web page. We will note the date of the most recent revision of this Online Privacy Policy at the top of the page.

This Policy was updated on 05/23/2016.