

## **PRIVACY POLICY**

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This privacy policy sets out how RiverOak Investment Corp., LLC (“RiverOak”) uses and protects any information that you provide RiverOak.

RiverOak is devoted to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when accessing your account information, you can be assured that such information will only be used in accordance with this privacy statement.

RiverOak has a firm policy of protecting the confidentiality and security of information that we collect from our Investors. We do not share your non-public personal information with unaffiliated third parties. Information is only shared with your consent except for the specific purposes below, in accordance with all applicable laws. Please read this policy carefully. It gives you important information about how we handle your personal information.

RiverOak reserves the right to change this policy at any time.

## **USE OF INFORMATION**

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We limit the collection and use of non-public personal information to the minimum we believe is necessary to deliver superior service to you. Services can include advising you about our investments, services and other opportunities, maintaining your account with us, providing you with your K-1 tax documents so that you can properly file your returns, processing distribution and contribution transactions and administering our business.

## **WHAT WE COLLECT**

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We obtain most non-public personal information directly from you or your agents whether in person, by telephone or electronically.

We may obtain the following information:

- First name, last name and job title
- Contact information including home address, email address, business address, home telephone numbers and business telephone numbers
- Social Security Numbers
- Employee Identification Numbers
- Banking information such as wiring information
- Accounts with us and transactions and interactions by us, with us or through us

## DISCLOSURE

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We do not disclose any kind of non-public personal information about our Investors or former Investors to anyone, except when we believe it necessary for the conduct of our business, or where disclosure is required by law. Except in those specific, limited situations, without your consent, we will not make any disclosures of non-public personal information to other companies who may want to sell their products or services to you.

## WHAT WE DO WITH THE INFORMATION WE GATHER

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We require this information to understand your needs and provide you with better service, and in particular for the following reasons:

- Internal record keeping
- We send email about new investment properties, investor statements, valuation statements, capital calls or other information which we think may be valuable using the email address which you have provided
- From time to time, we may also use your information to contact you for general account information and for collecting capital calls. We may contact you by email, phone, fax or mail
- We may use the information to customize our website to provide better service to you
- We are required by law to provide certain information, including social security numbers and addresses, to the Internal Revenue Service and state and local taxing authorities

## SECURITY

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We are committed to ensuring that your information is secure. In order to prevent unauthorized access or disclosure we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect. In ensuring that your information is secure we partner with Miles Technologies, a leading provider of technology-based business solutions to small and medium-sized businesses. Miles Technologies uses the **Barracuda Web Site Firewall** that provides award-winning protection against hackers leveraging protocol or application vulnerabilities to instigate data theft, denial of service or defacement of their Web site.

### **Powerful, Complete Solution**

The **Barracuda Web Site Firewall** protects Web applications and Web services from malicious attacks, and can also increase the performance and scalability of these applications. The Barracuda Web Site Firewall offers every capability needed to deliver, secure and manage enterprise Web applications from a single appliance through an intuitive, real-time user interface.

- Single point of protection for inbound and outbound traffic for all Web applications
- Protects Web sites and Web applications against application layer attacks
- Delivers best practices security right out of the box
- Monitors traffic and provides reports about attackers and attack attempts
- Protection against common attacks
- Outbound data theft protection
- Web site cloaking
- Granular policies
- Secure HTTP traffic
- SSL Offloading
- SSL Acceleration
- Load Balancing

### **Controlling your personal information**

We will not sell, distribute or lease your personal information to third parties unless we have your permission or are required by law to do so.