

Circletree Enterprises Data Code of Conduct

Our Values:

Circletree Enterprises, its affiliates, and employees are committed to responsible collection, management, use, and protection of data.

We recognize our obligations to all our shareholders, clients, and employees.

We work with many categories of data and use the term data in its broadest sense. Data includes client data and all information and data related to the operation of our businesses.

Our Practices:

We will:

- be transparent with clients;
- treat data in accordance with all applicable laws, regulations, and treaties;
- implement fair and reasonable data policies and procedures;
- treat data as confidential;
- secure, collect, process, use, and store data appropriately;
- implement necessary and appropriate technical measures to secure data;
- delete data when required to do so; and
- ensure employees and affiliates understand their roles in upholding these values and practices.