

## **FRM User Portal Privacy Notice**

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Last Revision Date: ~~February 17, 2016~~ March 1, 2018

The Portal ([www.frmclientportal.com](http://www.frmclientportal.com)) ("Portal") is a service made available to entities ("Subscribers") that have subscribed to Financial Risk Mitigation, Inc.'s ("FRM's") services. The Portal is intended for commercial transactions and not personal transactions. The Portal is available only to individuals ("Users") of Subscriber who have entered into a Terms of Service Agreement or ~~Subscriber other a~~ Agreement with FRM. Users are entitled to access the portal in connection with the Terms of Service or ~~Subscriber other~~ Agreement with FRM. In the course of using the Portal, a User may provide Personal Information. Use of any capitalized Terms rely on the same definitions at <https://www.frm-inc.com/frmclientportaltermsofservice/>.

**Subsidiary, Affiliate, and Third-Party Websites.** This Privacy Notice applies to this Portal only. To the extent the Portal permits you to link to or otherwise access other websites, separate privacy policies may apply to those linked websites. Those separate privacy policies may contain terms different than those contained in this Privacy Notice, and your access to and use of such linked websites are not governed by this Privacy Notice.

FRM expressly disclaims any and all responsibility for your access to and use of such linked websites, as well as, for any use of the information that you may provide, or any information that may be collected about you, at such linked sites.

**Cookies.** The Portal makes use of Session Cookies to provide for Time Zone Offsets, Session Locale Settings, Session Identification, and Session Termination. The Portal does not make use of persistent cookies.

**Type of Personal Information.** Using some sections of the Portal, requires registration. The information required to register includes, your legal name, work address, telephone number, mobile number, facsimile number, email address, company or employer, password, and selection of non-wallet based challenge questions and answers.

FRM tracks by User access to the registered portions of the Portal including dates and times of access, the IP address attempting access to the Portal, and the specific Content accessed.

FRM also tracks the browser attempting to access the Portal and operating system, but FRM generally does not try to tie back such information to the User's account, except as may be required to provide technical support to a User attempting to access the Portal.

The Purpose of collecting Personal Information is to authenticate the User's identity as an Approved User of the Portal, prevent unauthorized intrusion and access, and in the event of a compromise of a User's account to understand the scope of the Content and sSystems that may have been compromised.

Personal Information may also be used for other ~~general-FRM internal~~ marketing and record keeping Purposes.

**Disclosure of Personal Information.** FRM treats ~~yourUser's~~ Personal Information as Confidential Information subject to the definition and exclusions under the [Client Portal Terms of Service](#) agreement accessible [here](#).

FRM may also disclose and transfer ~~your-User's~~ Personal Information during a merger or during the divestiture of company assets. However, we will require any acquiring organization to agree to protect the privacy of ~~your-User's~~ Personal Information.

FRM may share ~~your-User's~~ Personal Information with affiliated companies or with third party service providers to accomplish the Purpose for which the information was collected.

**Cross Border Flow of Data.** FRM is a United States Corporation with operations in many other countries. From whatever place you provide information to this website (or from which information is collected), you should expect that it will be processed in the United States. Your use of the website constitutes your consent for any cross-border data transfer resulting from such use.

**Integrity, Protection and Retention of Your Personal Information.** ~~While FRM endeavors to protect your Personal Information, FRM cannot warrant the security of any Personal Information, and ultimately, you provide your personal information to us at your own risk.~~ FRM makes uses of commercially reasonable security practices to safeguard your Personal Information and to protect unauthorized intrusions and access to your Personal Information.

**Modification to Privacy Notice.** FRM reserves the right to change the terms of this Privacy Notice at any time. Updated versions of this Privacy Notice will appear on or as a link on the Portal and are effective immediately upon posting. User is responsible for regularly viewing this Privacy Notice. Continued use of the Portal after such changes constitutes User's consent to such changes.

**Questions & Comments.** If you have any questions, please email [compliance@frm-inc.com](mailto:compliance@frm-inc.com).