



## Privacy Policy

### 2024 Privacy Policy

Last Updated: November 20, 2024

[View the California Consumer Privacy Act \(CCPA\) policy](#)

Bolotin Financial Group (“Company,” “we” or “us”) is committed to respecting the privacy rights of its customers, visitors and other users of its website. We created this Website Privacy Policy to demonstrate our commitment to fair information practices and the protection of privacy. Our information practices for this website are described below.

### Scope

This Privacy Policy applies to the website located at [www.BolotinFinancialGroup.com](http://www.BolotinFinancialGroup.com) (the “Site”). It does not apply to any separate sites of our affiliated companies, subsites or third-party sites that might be linked to, or accessible from, the Site.

This Website Privacy Policy applies to information about you obtained through the Site. This Website Policy explains how we may collect, use, disclose, and protect your personal information; with whom we share your personal information; and the privacy options available to you regarding our use of your personal information; and how to contact us regarding our privacy practices for the Site. This Policy does not apply to information we collect offline or through other means, including on any other website operated by Company or any third party (including our affiliates and subsidiaries), or information collected by any third party (including our affiliates and subsidiaries), including through any application or content (including advertising) that may link to or be accessible from or through the Website.

Please read this Privacy Policy carefully to understand our policies and practices regarding your information and how we treat it.

**By visiting or using the Site, you consent to our collection, use and disclosure practices and other activities as described in this Website Privacy Policy. This Policy may change from time to time (see Changes to Our Privacy Policy). Your continued use of this Website after we make changes is deemed an acceptance of those changes, so please check this Policy for updates.**

**IF YOU DO NOT AGREE WITH ALL OF THE PROVISIONS OF THIS PRIVACY POLICY, THEN YOU MUST EXIT THE WEBSITE IMMEDIATELY.**

### Special Notice for International Users

If you are visiting this Site from outside of the United States, please be aware that we are based in the United States, and the information we obtain through the Site will be transferred to,

processed, and stored in our servers in the United States. The data protection laws and regulations applicable to your personal information transferred to the United States may be different from the laws in your country of residence. By using the Website, you understand and agree that your personal information and other information may be transferred to, processed by, and stored at our facilities in the United States and those third parties with whom we share it as described in this Privacy Policy.

## **Information We Collect**

### **Information We Collect Directly**

When you visit the Site, your browser automatically provides, and we may automatically collect, certain personal information about when you access or use the Site (“Usage Information”).

Usage Information includes:

- **Preferences and settings:** time zone, language and character size
- **Identifiers:** computer IP address; unique mobile device identifier
- **Technical information:** type of device, operating system or platform (Mac, Windows), browser information (type, version)
- **Connection:** Internet provider or mobile carrier name, connection speed and connection type; Internet service provider (ISP)
- **URL of the last Web page visited before visiting our Site; exit page**
- **Information about your use of the Site:** data stamp, pages viewed, time spent on a page, click through, clickstream data, queries made, search results selected, history, comments made
- **Location:** general geographic location

The methods that may be used on the Site to collect Usage Information include:

- **Log Information:** Log information is data about your use of the Site, such as IP address, browser type, internet service provider, referring/exit pages, operating system, date/time stamps, and related data, and may be stored in log files.
- **Information Collected by Cookies and Other Tracking Technologies:** Cookies, web beacons (also known as “tracking pixels”), embedded scripts, location-identifying technologies, device recognition technologies, and other tracking technologies (“Tracking Technologies”) may be used to collect information about your interactions with the Site. Brief descriptions of common Tracking Technologies are provided below:
  - **Cookies.** A cookie is a small text file that is stored on a user’s device. Session cookies make it easier for you to navigate the Site and expire when you close your browser. Tracking cookies remain longer and help in understanding how you use the Site and enhance your user experience. Cookies may remain on your hard drive for an extended period of time. If you use your browser’s method of blocking or removing cookies, some but not all types of cookies may be deleted and/or blocked and as a result, some features and functionalities of the Site may

not work. A Flash cookie (or locally shared object) is a data file which may be placed on a device via the Adobe Flash plug-in that may be built-in to or downloaded by you to your device. HTML5 cookies can be programmed through HTML5 local storage. Flash cookies and HTML5 cookies are locally stored on your device other than in the browser and browser settings won't control them. To identify certain types of local shared objects on your device and adjust your settings, please. The Site may associate some or all of these types of cookies with your device(s).

- **Web Beacons.** Web beacons are small graphic images, also known as “Internet tags” or “clear gifs,” embedded in web pages. Web beacons may be used, for example, to count the number of visitors to the Site, to monitor how users navigate the Site or how long they remain on the Site, and to count content views. Some technologies will notify you of the presence of Web beacons, but browsers typically do not notify you of them.
- **Embedded Scripts.** An embedded script is programming code designed to collect information about your interactions with the Site. It is temporarily downloaded onto your computer from our web server, or from a third party with which we work, and is active only while you are connected to the Site and deleted or deactivated thereafter.
- **Location-identifying technologies.** GPS (global positioning systems) software, geo-filtering and other location-aware technologies locate (sometimes precisely) you, or make assumptions about your location, for purposes such as verifying your location and delivering or restricting content based on your location. If you have enabled GPS or use other location-based features on the Site, your device location may be tracked.
- **Fingerprinting.** Collection and analysis of information from your device, such as, without limitation, your operating system, plug-ins, system fonts and other data, for purposes of identification and/or tracking.
- **Device Recognition Technologies.** Technologies, including application of statistical probability of data sets, as well as linking a common unique identifier to different device use (e.g., Facebook ID), which attempt to recognize or make assumptions about users and devices (e.g., that a user of multiple devices is the same user or household).
- **In-App Tracking Methods.** There are a variety of Tracking Technologies that may be included in mobile applications, and these are not browser-based like cookies and cannot be controlled by browser settings. Some use device identifiers, or other identifiers such as “Ad IDs,” to associate app user activity to a particular app and to track user activity across apps and/or devices.

Some information about your use of the Site and certain third-party services may be collected using Tracking Technologies across time and services and used by us and third parties for purposes such as to associate different devices you use and deliver relevant ads and/or other content to you on the Site and certain other websites or online services.

## **Information You Provide to Us**

In some circumstances, you may elect to provide us with certain personal information through the Site.

This is the case if you subscribe to a newsletter, register for an event, contact us through email, login to a portal or request a proposal. Personal information you may submit through the Site includes your name, email address, phone number, company affiliation, state, education, employment background or other contact or personal information that you choose to disclose.

Certain features available on the Site may require you to submit personal information in order for those features to function as designed. This is the case, for example, when setting passwords through the Site. You may choose not to provide personal information in those cases, but this may prevent you from being able to use those features.

## **Information We Collect From Other Sources**

We may also obtain information about you through external sources, such as public databases, service providers, joint marketing partners, social media platforms, from people with whom you are connected through social media platforms, and from third parties. We will treat such information in accordance with this Website Privacy Policy. We are not responsible or liable for the accuracy of the information provided by third parties or for third-party policies or practices.

## **Use and Disclosure of Personal Information**

Except as otherwise stated in this Website Privacy Policy, we do not sell, trade, rent, or otherwise share for marketing purposes the personal information that we collect through the Site with third parties.

In general, we use or may use your information for the following purposes:

- Provide services
- Respond to your questions and other requests for information made through the Site
- Send invitations to our conferences, webinars and other events that we think may be of interest to you
- Send our newsletter or other communications that you have requested or that may be of interest to you, in accordance with your preferences
- Process your registration and manage your account through an online portal
- Allow you to send content to a friend through the Site
- Tailor Site features to you and improve your Site experience, such as personalizing content to your preferences or interests or by expediting the processing and completion of a transaction
- Facilitate your use of the Site
- Serve you advertisements

- Perform data analysis and audit
- Enhance, improve or modify the Site, identify usage trends, determine the effectiveness of our promotional campaigns, diagnose technical problems, and operate and expand our business activities
- Prevent and address fraud, breaches of policies or terms, and threats of harm
- Perform other functions as otherwise described at the time of collection
- To comply with any applicable laws, such as to satisfy reporting obligations
- To notify you about changes to our Site or any products or services we offer or provide through it

We may use de-identified information for any purpose that is permitted by applicable law.

### **Sharing and Disclosure of Information**

We may share your personal information with the following entities or in the following circumstances:

- **At your direction or with your consent**
- **To fulfill the purpose for which you provided it**
- **Service providers and business partners** – We may share your personal information with our service providers, suppliers, subcontractors and similar third parties who provide services to us or act on our behalf so that they can assist us with the provision, upkeep and maintenance of the Site and other related activities, such as the organization of conferences and webinars, or email delivery or auditing. Third-party service providers are not meant to use personal information except as necessary to provide the relevant service to us.
- **Analytics** – We use automated tools and applications, such as Google Analytics, to evaluate use of the Site. These third-party services use cookies and other tracking technologies to perform their services.
- **Affiliates/Our companies**– We may share your personal information with entities that are under common ownership or control of our parent company (“affiliates”) for the purposes described in this Website Privacy Policy under “Use and Disclosure of Personal Information.” Such applicable affiliates generally include subsidiary companies of our parent company and providing insurance brokerage and consulting services, which may be referenced throughout the Site. Subject to local requirements, this information may be used to provide legal and related services offered by our affiliates and for the purposes described in this Website Privacy Policy.
- **Sale, merger, and corporate reorganization** – We may transfer your personal information to a third party in the event of a reorganization, sale, merger, joint venture, assignment, transfer or other disposition of all or any portion of our business, asset or stocks, including in the event of corporate restructuring of us or our affiliates.

- **For any other purpose we disclose when you provide the information**

There may be times when we share your personal information if we believe such disclosure is necessary, especially in the following cases:

- **Compliance with applicable laws** – When we believe it is necessary or appropriate under applicable laws, including laws outside your country of residence, or to comply with legal process.
- **Fraud prevention and protection of legal rights** – When we believe it is necessary to enforce our terms and conditions; to investigate, prevent or respond to suspected illegal or fraudulent activity; to protect the safety, rights or property of Bolotin Financial Group; or to exercise or protect legal rights or defend against legal claims; to allow us to pursue available remedies or limit the damages that we may sustain.
- **Government authorities** – If law enforcement authorities, courts or regulators, or other public or government authorities with appropriate jurisdiction – including public or government authorities outside your country of residence – request that we provide user information, and such request is made using the method required by law in the applicable jurisdiction, such as a search warrant, subpoena or a court order, and we believe that such request is facially valid, we will provide any information we have about a user that responds to such request.

We reserve the right to disclose any information about you that we obtain through the Site. You acknowledge that such transfers may occur and are permitted by and subject to this Website Privacy Policy.

### **Analytics Statistical Information**

We aggregate information regarding what portions of the Site users are visiting to develop statistics about the use of the Site. This information helps us create a better experience for users of our Site. For example, we may upgrade those parts of the Site that are heavily visited or optimize the website to work more efficiently with certain operating systems.

We may provide such aggregated, anonymized or statistical information to third parties, such as our advisers or consultants for research, analytical or strategic purposes. This information is not intended to allow the identification of any specific user of our Site.

We may use analytics services, cookies and other Tracking Technologies to help us analyze Site users and how they use the Site. Information generated by these services (e.g., your IP address and other Usage Information) may be transmitted to and stored by service providers and these service providers may use this information for purposes such as evaluating your use of the Site, compiling statistics reports on the Site's activity and providing other services relating to Site activity and other internet usage.

### **Minors**

The Site is not intended for, nor targeted to, children under 13, and we do not knowingly collect any personal information from children under 13. If you are under 13, do not use or provide any information on this Website or through any of its features, register or create an account on the

Website, make any purchases through the Website, use any of the interactive or public comment features of this Website, or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us at [info@bolotinfincialgroup.com](mailto:info@bolotinfincialgroup.com).

\*California residents under 16 years of age may have additional rights regarding the collection and sale of their personal information. See our California Resident Privacy Policy for more information.

### **Links to Third-Party Websites**

The Site may contain links to other websites or services. Third-party sites may use their own Tracking Technologies to independently collect information about you or solicit personal information from you. We accept no responsibility or liability for privacy or other issues related to the collection or use of your information by such other websites, services or third parties.

We urge you to be aware when you leave our Site, and to read the privacy statements of each website on which you land after you click on a link or social networking button located on our Site.

Links to third-party websites or services are provided for your convenience and information. The inclusion of a link to a third-party website or service does not imply endorsement of the third party's data handling practices and does not imply that their practices are covered by this Website Privacy Policy.

### **Security**

We take reasonable technical, organizational, and administrative measures to protect personal information collected through this Site against unauthorized or unlawful processing and against accidental loss, destruction or damage. However, because transmission via the Internet and online digital storage is not completely secure, we cannot guarantee the security of any information we may have collected from or about you through the Site.

When the circumstances require, we use encryption technology (data scrambling) and authentication tools to protect information that you may provide through the Site. In addition, our employees are instructed that such information is to be used only in accordance with this Website Privacy Policy, and other information security policies and procedures we may adopt from time to time, and the laws applicable to each specific business.

We will not collect any information such as your Social Security number or a bank or credit card account number through the Site. Third-parties are used to process any bank card or credit card transactions. If you need to send us confidential information and are concerned about the security of the Site, then you should consider sending it via another secure connection or method.

If you believe that your interaction with the Site is no longer secure, please immediately notify us of the problem in accordance with the "How to Contact Us" section below.

## **Users' Rights**

### **Choice Regarding Emails or Marketing**

If you no longer want to receive emails or marketing-related materials from us, you may opt out of receiving these materials by following the unsubscribe instructions in such messages or by contacting us as indicated in the "How to Contact Us" section below. We will comply with your request as soon as practicable. Please note that even if you opt out of receiving email alerts from us, we may continue to send you other email communications.

### **Access**

Each user has the right to review, change or suppress personal information that can reasonably be linked to, and that we have collected from that user. You may exercise this right by contacting us as indicated in the "How to Contact Us" section. For your protection, we may need to verify your identity before implementing your request. We will try to implement your request as soon as reasonably practicable.

However, please note that we reserve the right to refuse to act on a request that is manifestly unfounded or excessive (e.g., because it is repetitive) and/or to charge a fee that takes into account the administrative costs for providing the information or the communication or taking the action requested. If you have a question, comment or request, please contact us as explained in the "How to Contact Us" section below.

### **Opt Out of Tracking Technologies**

Regular cookies generally may be disabled or removed using tools available as part of most commercial browsers, and in some instances blocked in the future by selecting certain settings. Browsers offer different functionalities and options so you may need to set them up separately. Most browsers contain information on how to control or delete cookies. These settings will typically be found in the "Options" or "Preferences" menu of a browser. You may wish to refer to <https://www.allaboutcookies.org/manage-cookies/>. Also, tools from commercial browsers may not be effective with regard to Flash cookies (also known as locally shared objects), HTML5 cookies or other Tracking Technologies. Please be aware that if you disable or remove these technologies, some parts of the Site may not work and that when you revisit the Site, your ability to limit browser-based Tracking Technologies is subject to your browser settings and limitations.

Your browser settings may allow you to transmit a "Do Not Track" signal when you visit various websites. The "Do Not Track" feature of these browsers sends a signal that informs operators of services online that the user does not want certain information about their online activities to be collected over time and across websites or online services. The Internet industry has not yet agreed on a definition of what "Do Not Track" means, how compliance with "Do Not Track" would be measured or evaluated, or a common approach to responding to a "Do Not Track" signal. Consequently, due to the lack of guidance, like many websites, we have not yet developed features that would recognize or respond to browser-initiated "Do Not Track" signals.

\*Residents of California may have additional personal information rights and choices. See our California Privacy Policy for more information.

### **Opt Out of Analytics and Interest-Based Advertising**



You may exercise choices regarding the use of cookies from Google Analytics by visiting <https://tools.google.com/dlpage/gaoptout> or downloading the Google Analytics Opt-out Browser Add-on. You may exercise choices regarding the use of cookies from Adobe Analytics by visiting <https://www.adobe.com/privacy/opt-out.html>.

### **Changes to our Privacy Policy**

We may modify or supplement this Website Privacy Policy from time to time because we may change our offering and/or data handling practices, or because new laws have been enacted. If we make any material changes to this Website Privacy Policy, we will post the updated Website Privacy Policy here, along with its effective date, and notify users as required by applicable law. You should review this page regularly to look for changes in this Website Privacy Policy.

We may modify or supplement this Website Privacy Policy from time to time because we may change our offering and/or data handling practices, or because new laws have been enacted. If we make any material changes to this Website Privacy Policy, we will post the updated Website Privacy Policy here, along with its effective date, and notify users as required by applicable law. You should review this page regularly to look for changes in this Website Privacy Policy.

### **How to Contact Us**

To write to us regarding this Website Privacy Policy and our personal information handling practices, please contact us as follows:

Email: **[info@bolotinfinancialgroup.com](mailto:info@bolotinfinancialgroup.com)**

Address: 301 Edgewater Place, Suite 200, Wakefield, MA 01880

Phone: 781-876-4101

We will do our best to respond to your request within 30 days and, in any event, we will respond within the timescales required by applicable data protection law.

Regarding email communications: note that email communications are not always secure. Thus, please do include any confidential or sensitive information in any emails.

Regarding postal communications, please be aware that it may take us longer to route and process your request if it is made on paper than we would take with an electronic message.