

Legal

LEGAL STATEMENT

The information contained within this website is only for general information and RKCA, Inc. (the "Company") assumes no responsibility for its accuracy or completeness. The Company cannot and does not accept responsibility or liability for any actions taken based upon the content of this website. Information provided through this website may contain errors, inaccuracies, omissions, or may be outdated. All information and material contained on this website is provided on an "as is" basis without any warranty or representation of any kind, either expressed or implied, and the Company expressly disclaims any implied warranty of merchantability or fitness for a particular purpose, including any warranty for the use of this website or any information on this website with respect to its correctness, quality, accuracy, completeness, reliability, performance, timeliness, or continued availability. The Company reserves the right, at any time and from time to time, in the interests of its own editorial discretion and business judgment to add, modify, or remove any of the information on this website.

Use this website at your own risk. Under no circumstances is the Company liable for any direct, indirect, incidental, consequential, punitive, or other damages of any kind arising out of your access to or use of this or any linked website, including without limitation, loss of business or program, interrupted or delay of business or program, or loss of revenue.

The material and information contained within this website does not constitute legal, accounting, financial, regulatory or other advice. The material and information on this website has been prepared without regard to any particular user's investment objectives, financial situation, or means, and the Company is not soliciting any action based upon it. The fact that the Company has made material and information provided on this website available is not a recommendation that you enter into a particular transaction and is not a representation that any product or service described on this website is suitable or appropriate for you. The information on this website is not to be construed as a recommendation, or an offer to buy or sell, or the solicitation of an offer to buy or sell any security, financial product, or instrument; or to participate in any particular trading strategy in any jurisdiction in which such an offer or solicitation, or trading strategy would be illegal. Certain transactions, including those involving futures, options, and high-yield securities, give rise to substantial risk and are not suitable for all investors. While the Company endeavors to provide reliable and timely information, it has not verified any material or information on this website and does not represent that this material or information is accurate, current, or complete and it should not be relied upon as such.

PRIVACY POLICY

The Company respects your right to privacy. This Privacy Policy summarizes what personal information we may collect, how we may use this information, and other important topics relating to your privacy and data protection.

It is the Company's policy to comply with all applicable privacy and data protection laws. This commitment reflects the value we place on earning and keeping the trust of our customers, business partners and others who share their personal information with us.

This Policy applies to all Internet sites operated by or on behalf of the Company. It also applies to personal information we may otherwise collect: (i) through our products and services; (ii) when you interact with us by means other than this website, for example, in person or by telephone; and (iii) from our customers, distributors, suppliers, vendors, and other business partners (collectively "Business Partners").

THE COMPANY'S COLLECTION, USE AND DISCLOSURE OF PERSONAL INFORMATION

To the extent required by applicable law, whenever the Company collects personal information, we will:

- provide timely and appropriate notice to you about our data practices;
- collect your personal information only for specified and legitimate purposes. The information we collect will be relevant, adequate and not excessive for the purposes for which it is collected;

- process your personal information in a manner consistent with the purposes for which it was originally collected or to which you have subsequently consented;
- take commercially reasonable steps to ensure that your personal information is reliable for its intended use, accurate, complete, and, where necessary, kept up-to-date;
- not use your personal information for direct marketing purposes without giving you an opportunity to “opt-out”; and
- take appropriate measures, by contract or otherwise, to provide adequate protection for personal information that is disclosed to a third party or transferred to another country, including transfers within the Company.

PERSONAL INFORMATION THE COMPANY COLLECTS

The Company collects the following types of personal information:

- **Information You Provide**

The Company collects personal information you provide us, which may include: (i) contact information, such as your name, company name, job title, address, e-mail address, and phone number; (ii) additional information about how you use our products or services; (iii) comments, questions, and requests you may make; and (iv) information about your preferences, such as your preferred methods of communication and the types of services in which you are interested.

- **Information Automatically Gathered from Your Device**

Device and browser information. The Company may collect technical information about your device, such as device type, browser type, IP address, operating system, and device identifier. The Company collects this information automatically from your device and web browser through cookies and similar technologies.

Information about how you interact with us. The Company may collect technical data about your usage of the Company website and how you interact with our digital advertisements and promotions, such as content viewed or downloaded, features used, links clicked, Company promotional emails opened, and dates and times of interactions. The Company collects this information using cookies and similar technologies.

Location information. The Company may collect location information, including precise real-time location information from your device and imprecise location information derived from, for example, your IP address or postal code.

- **Cookies and Similar Technologies:**

A “cookie” is a file of information placed on your device when you visit a website. Cookies and similar technologies can enhance your user experience by saving your preferences, personalizing your online experience, and sometimes providing you with advertising which is tailored to your interests.

This website uses “session cookies.” A session cookie does not identify you personally and expires after you close your browser.

This website also uses “persistent cookies.” These cookies do not expire when you close your browser. Persistent cookies stay on your computer until you delete them or they expire. By assigning your computer a unique identifier, we are able to create a database of your previous choices and preferences which can be provided by us automatically, saving you time and effort on future visits.

Although you are not required to accept cookies when you visit this website, you may be unable to use all of the functionality of the site if you reject certain cookies.

In addition, your browser may allow you to adjust settings to accept or reject cookies, or to alert you when a cookie is placed on your computer.

Analytics. This website uses Google Analytics, a web analytics service provided by Google, Inc. (“Google”). Google Analytics uses cookies. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators, and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google’s behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, but please note that if you do this you may not be able to use the full functionality of this website. By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

- **Information from Business Partners and other Third Parties**

The Company collects personal information through our Business Partners. This information may include contact information, such as name, company name, job title, address, e-mail address, and phone number.

The Company may also obtain personal information from other third-party sources, including publicly and commercially available sources. We may combine the information we receive from our Business Partners and other third-party sources with information that we collect from you or your device, as described above.

You have choices about the personal information you provide the Company. You may choose not to provide information that we request, but if you do so, we may not be able to provide you a relevant service or a particular feature of this website.

HOW THE COMPANY USES YOUR PERSONAL INFORMATION

The Company may use your personal information to:

- **Develop and manage our relationships with you and our Business Partners.** This may include: (i) delivering services or carrying out transactions that you or our Business Partners have requested; (ii) providing information about Company products, services, and transactions, and advertisements, that may be of interest to you; (iii) providing you and our Business Partners a more consistent experience in interacting with the Company, including by learning more about you and how you use and interact with the Company's website; and (iv) planning, managing, and performing under our contractual relationships with our Business Partners.
- **Communicate with you or your company.** This may include: (i) informing you of Company products, services, and promotional activities that may be of interest to you or your company; (ii) providing information about relevant Company products, services, and transactions, including, for example, pricing information, technical data, invoice, shipping, or production information, warranty or recall information, or information about product or service improvements; (iii) responding to questions or inquiries that you make, including customer service requests; and (iv) inviting you to participate in, or informing you of the results of, customer satisfaction or market research surveys.
- **Provide and improve our website and services.** This may include: (i) customizing them to your preferences or interests, making them more compatible with your technology, or otherwise making them easier to use; (ii) maintaining the security of and otherwise protecting them; and (iii) developing new Company websites, products, and services.
- **Address legal issues.** This may include: (i) complying with our obligations to retain certain business records for minimum retention periods; (ii) establishing, exercising, or defending legal claims; (iii) complying with laws, regulations, court orders, or other legal process; (iv) detecting, preventing, and responding to fraud, intellectual property infringement, violation of our contracts or agreements, violations of law, or other misuse of the Company website or services; and (v) protecting the Company's rights or property, or yours or others' health, safety, welfare, rights, or property.

The Company may anonymize or aggregate any of the information we collect and use it for any purpose, including for research and product-development purposes. Such information will not identify you individually.

WHEN THE COMPANY MAY SHARE YOUR PERSONAL INFORMATION

The Company will not disclose your personal information except as described here:

- The Company may share your personal information with other Company entities, including those in different countries. When we do so, these other Company entities will use your information in a manner consistent with this Policy and all applicable privacy and data protection laws.
- The Company may also share your personal information with third parties we hire to perform support services for us. These third parties are required to use the personal information we share with them only to perform services on our behalf and to treat your personal information in compliance with all applicable privacy and data protection laws.
- In some cases, the Company may share your personal information with third parties who partner with us to provide products and services to our customers, such as distributors. If so, we will require our Business Partners to use that information in a manner consistent with this Policy and all applicable privacy and data protection laws.
- The Company may share your personal information with third parties when we have a good faith belief that disclosure is necessary: (i) to comply with a law, regulation, court order, or other legal process; (ii) to detect, prevent, and respond to fraud, intellectual property infringement, violation of our contracts or agreements, violation of law, or other misuse of the Company website, products or services; (iii) to protect Company rights or property or yours or others' health, safety, welfare, rights, or property; or (iv) under similar circumstances. If such an event occurs, we will take appropriate steps to protect your personal information.
- The Company may share your personal information with third parties in connection with the sale, purchase, merger, reorganization, liquidation or dissolution of the Company or a Company business unit, or under similar circumstances. If such an event occurs, we will take appropriate steps to protect your personal information.
- The Company may share your information with your permission or at your request.
- The Company may share anonymized or aggregated information internally and with third parties for any purpose. Such information will not identify

SECURITY OF YOUR PERSONAL INFORMATION

Your personal information will generally be stored in the Company's databases or databases maintained by our service providers. Many of these databases are stored on servers located in the United States. The Company takes appropriate measures, by contract or otherwise, to provide adequate protection for personal information that is disclosed to a third party or transferred to another country, including transfers within the Company.

The Company maintains reasonable safeguards to protect the confidentiality, security and integrity of your personal information. Although we use security measures to help protect your personal information against unauthorized disclosure, misuse, or alteration, as is the case with all computer networks linked to the Internet, we cannot guarantee the security of information provided over the Internet and will not be responsible for breaches of security beyond our reasonable control.

LINKS TO THIRD PARTY INTERNET SITES AND PLUGINS

The Company website may contain links to websites or mobile apps that are not operated by the Company and plugins from social media platforms and other third parties. An example of a social media plugin is the Facebook "Like" button. We provide these links and plugins as a service and do not imply any endorsement of the activities or content of the related websites, apps, or social media platforms, nor any association with their operators. To learn about the information collected by these third-party websites, apps, and plugins, please visit their privacy policies. We encourage you to review the privacy policies for the websites, apps, and social media platforms you visit before using them or providing personal information.

ACCESS TO YOUR PERSONAL INFORMATION

You may review, correct and update personal information you provide to us by using the [Contact](#) form on this website.

RETENTION OF YOUR PERSONAL INFORMATION

How long we keep your personal information will vary and will depend on the purpose and use of information collected. There are legal requirements that we keep some types of data for specific periods. Otherwise, we will retain it for no longer than is necessary for the purposes for which the data was collected.

CHILDREN

This website is not intended for children under 13 years of age. The Company will not knowingly solicit or collect personal information from or about children under 13, or the relevant minimum age under applicable local legal requirements, except as permitted under applicable law.

TRADEMARKS AND COPYRIGHTS

The content of this site is protected by copyright law and all relevant intellectual property rights belonging to the Company, its licensors, or other providers of such material. All content, trademarks, services marks, trade names, logos, icons, features, and functionality (including, but not limited to, all information, software, text, displays, graphics, photographs, illustrations, images, video, and audio; all pages and screens, the design, selection, and arrangement thereof; and all related metadata) are proprietary to the Company or its licensors or other providers. Nothing contained in this website or any other materials should be construed as granting, by implication, estoppel, or otherwise, any license or right to use any trademark displayed by the Company without the written permission of the Company or its licensors or other providers of such material. Your use of the trademarks or any other content displayed on this website, except as provided herein, is strictly prohibited.

Images displayed by the Company are either used with permission or the property of the Company. You are prohibited from using or authorizing the use of these images, except as provided herein. Any unauthorized use of the images may violate copyright laws, trademark laws, the laws of privacy and publicity, or other regulations and statutes. Pursuant to Section 512(c)(2) of the Copyright Revision Act, as enacted through the Digital Millennium Copyright Act, the Company has designated the following agent to receive notifications of claimed infringement: RKCA, Inc. 1077 Celestial Street Cincinnati, OH 45202.

INVESTOR EDUCATION

The Board of Governors of FINRA, Inc. has adopted a public disclosure policy that provides certain types of disciplinary information on FINRA Member Firms and their Associated Persons in response to written inquiries via FINRA's Regulation's web site address (www.finra.org) or telephone inquiries via FINRA Regulation's toll-free telephone Design listing (1-800-289-9999 or 1-800-289-9999).

Additionally, you may check the background of your investment professional by looking up a brokerage firm or broker in FINRA Broker Check. For questions regarding Broker Check, FINRA provides a toll-free hotline at (800) 289-9999 or (800) 289-9999, which is available Monday through Friday from 8:00AM until 8:00PM Eastern time. Broker Check may be found on the FINRA website at <http://www.FINRA.org> under the heading "Investors".

You may review the Firm's background and regulatory history on FINRA's Broker-Check system: <https://brokercheck.finra.org/>

CONFLICTS OF INTEREST

In certain transactions involving the purchase and sale of securities, the Company may be under common control with the issuer of a security. There are also certain situations in which the Company may act as an advisor to you with respect to certain securities in which the Company is participating or has a financial interest in the primary or secondary distribution.

Furthermore, the Company may serve as placement agent and/or manager for the investment company or operating company and may receive compensation for such services. Additionally, employees of the Company may serve on the board of directors or management team of the investment company or operating company as related to the respective securities offering and may directly or indirectly receive compensation for such services.

Please refer to the respective offering documents for disclosure of the conflicts of interest related to the Company's, and its employee's, role in the respective unregistered private securities offering.

GENERAL PRIVATE PLACEMENT RISKS

This website and any material or information on it does not constitute an offer to sell, a solicitation of an offer to buy, or a recommendation of any security or any other product or service by the Company or any other third party regardless of whether such security, product, or service is referenced on this website or any material or information on it. Prospective investors should consult their own professional advisors as to the legal, tax, financial, or other matters relevant to the suitability of any investment.

The Company offers unregistered private securities under exemptions from securities registration, such as Regulation D. Such offerings contain unique risks, terms, conditions and fees specific to each offering. Depending upon the specific investment product, investment risks include, but are not limited to, interest rate risk, credit risk, call risk and liquidity risk. In addition to the general risks related to securities, private offerings are subject to the respective risks of their industry and market.

Generally, most securities that you may acquire in a private placement will be restricted securities. You should not expect to be able to easily and quickly resell any such restricted securities which you may acquire. In fact, you should expect to hold any such securities indefinitely.

You should refer to the respective offering documentation for the risks respective to any private securities offering in which you may participate. You should not purchase a private unregistered security until you have read the specific offering documentation and fully understand the specific investment terms, features, fees and risks of such investment.

Please also read these Investor Alerts:

- FINRA Investor Alert: <http://www.finra.org/investors/alerts/private-placements-risks>
- SEC Investor Bulletin: Private Placements Under Regulation D: https://www.sec.gov/oiea/investor-alerts-bulletins/ib_privateplacements.html
- SEC Investor Alert: 10 Red Flags that an Unregistered Offering May Be a Scam: <https://investor.gov/additional-resources/news-alerts/alerts-bulletins/investor-alert-10-red-flags-unregistered-offering>

ADDITIONAL INFORMATION FOR EU RESIDENTS

- **The Company's lawful basis for processing your personal data**

The lawful basis for the Company's processing of your personal data will depend on the purposes of the processing. For most personal data processing activities covered by this Privacy Policy, the lawful basis is that the processing is necessary for the Company's legitimate business interests. Where we process personal data in relation to a contract, or a potential contract, with you, the lawful basis is that the processing is necessary for the performance of our contract with you or to take steps at your request prior to entering into a contract. When we are required to share personal data with law enforcement agencies or other governmental bodies, we do so on the basis that we are under a legal obligation to do so. We will also use consent as the legal basis where we deem appropriate or to the extent required by applicable law, for example, before we collect precise location data from your mobile device.

Processing on the basis of legitimate business interests. When we process personal information on the basis that the processing is necessary for our legitimate business interests, such interests include: (i) providing, improving, and promoting the Company website, products, and services; (ii) communicating with current and potential customers, other Business Partners, and their individual points of contact; (iii) managing our relationships with our customers and other Business Partners, and their individual points of contact; (iv) other business development purposes; (v) sharing information within the Company, as well as with service providers and other third parties; and (vi) maintaining the safety and security of our products, services and employees, including fraud protection.

Processing on the basis of performance of a contract. Examples of situations in which we process personal information as necessary for performance of a contract include e-commerce transactions in which you purchase a product or service from the Company, on your own behalf, through the Company website.

Processing on the basis of consent. Examples of processing activities for which the Company uses consent as its legal basis include: (i) collecting and processing precise location information from your mobile device; (ii) sending promotional emails when consent is required under applicable law; and (iii) processing personal data on the Company website through cookies and similar technologies when consent is required by applicable law.

Processing because the Company is under a legal obligation to do so. Examples of situations in which the Company must process personal data to comply with its legal obligations include: (i) payment of taxes and other government levies; (ii) providing your personal data to law enforcement agencies and other governmental bodies when required by applicable laws; (iii) retaining business records required to be retained by applicable laws; and (iv) complying with court orders or other legal process.

- **Additional information about the retention of your personal data**

To determine the period for which your personal data will be retained in accordance with this Policy, the Company considers criteria such as: (i) any applicable legal requirements to retain data for a certain period of time; (ii) any retention obligations related to actual or potential litigation or government investigations; (iii) any retention requirements in relevant agreements with our Business Partners; (iv) the date of your last interaction with the Company; (v) the length of time between your interactions with the Company; (vi) the sensitivity of the data; and (vii) the purposes for which the data was collected.

- **Your individual rights**

In accordance with the applicable laws in the European Union, you have the following rights with respect to your personal data, which apply differently in different circumstances: right of access, right to rectification, right to erasure, right to restriction of processing, right to data portability and right to object to processing. Most of these rights are not absolute. Below we describe these rights in more detail and provide information on how you can exercise them. If you make a request to exercise your rights, we will respond within one month, but have the right to extend this period by two additional months, where necessary. If we extend the response period, we will let you know within one month from your request. You can exercise your rights by using the [Contact](#) form on this website.

Right of Access. You have the right to ask the Company to confirm whether we process your personal data. If we do, you have the right to request access to your personal data that we process and the following information: (i) the purposes of the processing; (ii) the categories of personal data we process; (iii) the recipients or categories of recipients of your personal data; (iv) the envisaged retention period of the data where possible, or the criteria we use to determine the retention period; (v) your right to request rectification or erasure of your personal data, or restriction of the processing of such data; (vi) your right to file a complaint with a supervisory authority; (vii) if we have not collected the data from you, any information we have available about the source of the data; and (viii) whether we use your personal data to make any automated decisions that have legal or other similar significant effects on you.

Right to rectification. You have the right to have the Company correct your personal data if they are inaccurate. Taking into account the purposes of the processing, you may also have the right to have incomplete personal data about you completed, including by providing a supplementary statement to the Company.

Right to object to processing for the Company's legitimate business interests. You have the right to object to the Company processing your personal data when that data is processed on the basis of the Company's legitimate business interests. The Company will honor your objection and stop processing the relevant personal data unless: (i) we have compelling legitimate grounds for the processing that override your interests, rights, and freedoms; or (ii) we need to continue processing your personal data to establish, exercise, or defend a legal claim.

Right to object to processing for direct marketing. If the Company processes your personal data for direct marketing purposes, you have the right to object to this processing. If you exercise this right, the Company will stop processing your personal data for direct marketing purposes.

Right to restrict processing. You have the right to request that the Company restrict the processing of your personal data in the following circumstances: (i) for the period of time the Company needs to verify the accuracy of your personal data when you contest its accuracy; (ii) when the processing of your personal data is unlawful and you oppose the erasure of the data, and instead request that the Company restrict the use of the data; (iii) when the Company no longer needs your personal data for the purposes of processing, but you need the data to establish, exercise, or defend a legal claim; or (iv) for the period of time the Company needs to verify if it has compelling legitimate grounds for processing that override your interests, rights, and freedoms when you object to the processing of your personal data for the Company's legitimate business interests.

If following your request the Company restricts the processing of your personal data, we will store your data, and otherwise process it only with: (i) your consent; (ii) to establish, exercise, or defend a legal claim; (iii) to protect the rights of another natural or legal person; or (iv) for reasons of important public interest of the European Union or a Member State. The Company will also inform you before lifting the restriction of processing.

Right to erasure. The right to erasure is also called the “right to be forgotten.” You may ask the Company to delete your personal data. This right is not absolute. The Company is required to delete your personal data upon your request only in the following circumstances: (i) your personal data is no longer necessary for the purposes for which we collected or processed them; (ii) if the Company processes your personal data on the basis of consent, you withdraw your consent, and no other legal ground exists for us to continue processing your personal data; (iii) if the Company processes your personal data for its legitimate business interests, you object to the processing, and there are no overriding legitimate grounds for us to continue processing your personal data; (iv) if the Company has processed your personal data unlawfully; or (v) the personal data must be erased to comply with a legal obligation under European Union or Member State law to which the Company is subject.

The Company is not required to erase your personal data to the extent that the Company needs to process them to: (i) exercise its right of freedom of expression and information; (ii) comply with a legal obligation under European Union or Member State law to which the Company is subject; or (iii) to establish, exercise, or defend a legal claim.

Right to data portability. You have the right to receive personal data you provided to the Company when: (i) the processing of the data is based on your consent or is necessary for the performance of a contract between you and the Company; (ii) the Company's processing of your personal data is carried out by automated means; and (iii) complying with your request will not adversely affect the rights and freedoms of others.

If you have the right to receive such personal data and request that we provide it, the Company will provide it to you in a structured, commonly used, and machine-readable format.

Right to lodge a complaint with a supervisory authority. The Company will use its best efforts to address and settle any requests or complaints brought to its attention. In addition, you have the right to approach the competent data protection authority with requests or complaints. This can be the supervisory authority in the country or federal state where you live.

QUESTIONS ABOUT THIS POLICY

If you have any questions about this Policy or our use of your personal information, please contact:

RKCA, Inc.
Compliance Department
1077 Celestial Street
Cincinnati, OH 45202
1 (513) 371-5533

CHANGES TO THIS POLICY

Changes to this Policy will be posted on this site, along with information on any material changes. The Company reserves the right to update or modify this Policy at any time and without prior notice. Any modifications will apply only to the personal information we collect after the posting.

CLIENT TESTIMONIALS

The persons providing the testimonials on this website have experience in the services that RKCA, Inc. provided. Their respective experience with RKCA, Inc. may not be representative of all other Clients of RKCA, Inc. Testimonials are not paid for by RKCA, Inc. Testimonials do not constitute a guarantee of future performance or success related to any product, transaction or service.

This Policy was last revised in January 28, 2019.



1077 Celestial St. | Cincinnati, Ohio 45202
513-371-5533



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