# **Online Privacy Policy**

Your privacy is important to us at Dreman Value Management, LLC ("Dreman"). Our online privacy policy ("Privacy Policy") describes the types of information we gather from those persons visiting the Internet website www.dreman.com (the "Site") and how we use that information. In addition, this notice describes our privacy practices regarding information about individuals who are customers and former customers. By accessing this Site, you agree to be bound by the Privacy Policy. If you do not agree to the terms of this Privacy Policy, please do not use this Site. Each time you use the Site, the current version of the Privacy Policy will apply. Accordingly, when you use the Site, you should check the date of this Policy (which appears at the top) and review any changes since the last version.

# 1. Use of Information Collected by Us

Dreman may collect two types of information from users of our Site: "personally identifiable information" (such as name, e-mail address, mailing address, phone number, etc.) and "aggregate information" (such as frequency of visits to the Site, search terms entered, Site pages most frequently accessed, IP address, browser type, etc.)

We use all of this information in an effort to improve your experience on the Site and to communicate with you about information that you request. We may also use all of this information to help us target specific services or offers to you, to help us develop and improve our Site, and to tailor our Site to your interests.

# 2. Collection of Personally Identifiable Information

Dreman only collects personally identifiable information, such as name, address, phone number, fax number and email address, that is voluntarily provided when users request Dreman to contact them through the "contact us" section of the Site.

# 3. Collection of Aggregate information

Dreman also collects aggregate information, which is non-personally identifiable/anonymous information about you, such as IP address, browser type, etc. Aggregate Information is used in a collective manner, and no single person can be identified by that compiled information.

# 4. Sharing, Selling, and Trading Personally Identifiable Information Collected Online with Third Parties

Dreman does not share, rent, sell or disclose personally identifiable information to third parties, except as described in this Privacy Policy. In following circumstances, Dreman may share or transfer personally identifiable information to unrelated third parties: (i) to comply with a legal requirement, judicial proceeding, court order, or legal process served on Dreman, (ii) to investigate a possible crime, such as fraud or identity theft; (iii) in connection with the sale, purchase, merger, reorganization, liquidation or dissolution of Dreman; (iv) when we believe it is necessary to protect the rights, property, or safety of Dreman or other persons, or (v) as otherwise required or permitted by law.

# 5. Sharing, Selling and Trading Aggregate Information Collected Online With Third Parties

Dreman may sell, share or trade compiled aggregate information with third parties. As stated earlier, no single person can be identified by such aggregate information.

# 6. Children and Privacy

Our Site is not directed to children and we will never request personally identifiable information from anyone whom we know to be under the age of 13 without verifiable parental consent. If we become aware that a user is under the age of 13 and has registered without prior verifiable parental consent, we will remove his or her personally identifiable registration information from our files.

# 7. Security

The security of your personal information is important to us and Dreman is committed to handling your customer information carefully. We restrict access to your personally identifiable information to employees who need to know that information in order to provide services to you. We maintain physical, electronic and procedural safeguards that comply with federal standards to guard your personally identifiable information. In addition, we make reasonable efforts to follow generally accepted industry standards to protect the personally identifiable information submitted to us, both during transmission and once we receive it. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, while we strive to use commercially acceptable means to protect your personally identifiable information, we cannot guarantee its absolute security. IN NO EVENT WILL DREMAN OR ITS AFFILIATES OR ANY PARTY INVOLVED IN CREATING, PRODUCING OR DELIVERING THIS SITE BE LIABLE IN ANY MANNER WHATSOEVER FOR ANY INCIDENTAL, CONSEQUENTIAL, INDIRECT, SPECIAL OR PUNITIVE DAMAGES ARISING OUT OF YOUR ACCESS, USE OR INABILITY TO USE THIS SITE, OR IN CONNECTION WITH ANY FAILURE OR PERFORMANCE, ERROR, OMISSION, INTERRUPTION, DEFECT, DELAY IN OPERATION OR TRANSMISSION, COMPUTER VIRUS OR LINE OR SYSTEM FAILURE (INCLUDING LOSS PROFITS. LOSS OF BUSINESS OR DATA, BUSINESS INTERRUPTION, AND DAMAGES THAT RESULT FROM INACCURACY OF THE INFORMATION OR INCONVENIENCE, DELAY, OR LOSS OF THE USE OF THE SITE). THE FOREGOING LIMITATIONS APPLY WHETHER THE ALLEGED LIABILITY IS BASED ON CONTRACT, TORT, NEGLIGENCE STRICT LIABILITY OR ANY OTHER BASIS, EVEN IF DREMAN OR ITS AFFILIATES OR ANY OTHER PARTY HAS BEEN ADVISED OF THE POSSIBILITY OF SUCH DAMAGES.

# 8. Links to Other Websites

This Site may contain links to websites operated by other people or companies. Those websites may have their own privacy policy or no privacy policy at all. Dreman does not have any responsibility for those websites, and we provide the links solely for the convenience of our visitors.

# 9. Business Transfers

In the event that Dreman sells substantially all of its assets, or one of Dreman's business units are acquired, personally identifiable information of visitors to the Site and aggregate information will likely be one of the transferred assets.

### 10. Changes to this Policy

Dreman reserves the right to update or modify this Policy, at any time and without prior notice, by posting the revised version of this Policy on our Site.

### 11. Corrections/Information Removal/Opt-Out

If your name, e-mail or postal address, telephone number or other personally identifiable information changes, you may update, correct or omit the relevant information by contacting us at rfi@dreman.com. If you prefer not to receive marketing e-mails from Dreman, please let us know by (a) sending us an e-mail at unsubscribe@Dreman.com or (b) by clicking on the unsubscribe link within any marketing e-mail you receive from us. If you prefer not to receive marketing mail via the mail carrier, please let us know by sending a request to Dreman Value Management, LLC C/O Contrarian Services Corporation, Harborside Financial Center, Plaza 10, Suite 800, Jersey City, NJ 07311-4037. Please be sure to include in any e-mail or postal mail, your full name, e-mail address, postal address, and any message. Please note that such requests may take up to ten (10) days to become effective.

Also, when State law is more protective of individuals than federal privacy law, we will protect your personally identifiable information in accordance with state law.

#### 12. Contact Us

If you have questions regarding this Privacy Policy or the information collection and dissemination practices of this Site, please contact us at: E-mail: rfi@dreman.com Phone: 1-800-952-6667 Mail: Dreman Value Management, LLC C/O Contrarian Services Corp. Harborside Financial Center Plaza 10, Suite 800 Jersey City, NJ 07311-4037