



# SODALES PARTNERS

Allies On Your Journey

## Sodales: Latin for companions



A middle market buyout firm investing in manufacturing and industrial service businesses



### About Us

We will be an ally on management's journey to achieve its mission. We partner with management to maximize the value of its business and to do so with integrity. This is the Sodales® approach.

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### Investment Approach

We only invest in middle market and lower middle market manufacturing and industrial service businesses where we can bring our knowledge and relationships to bear to add more value than other prospective investors.

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## Representative Investments

Examples of the investments our team has made in manufacturing and industrial service businesses.

We invest across many industrial industries.

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## Resources


People are a company's most important resource and its key to success. Our people are the key to our ability to add value to your company. We bring exceptional knowledge and skills to bear for manufacturing and industrial service businesses.

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# ABOUT US



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We partner with management to maximize the value of its business and to do  
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What We Do

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Our Values

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# What We Do

## Our Mission

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We will be management's ally on its journey to achieve its mission. Fulfilling management's mission will also maximize the company's revenue growth, profitability, and capital efficiency. We bring knowledgeable and passionate resources to bear to help management enhance the value of its business, accelerating its success.



## Our Focus

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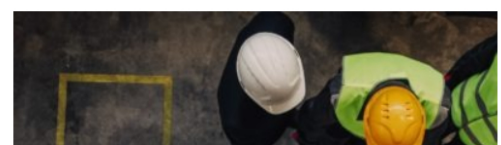
We make majority equity investments in middle market and lower middle market manufacturing and industrial service companies headquartered in the United States or Canada. We are experienced with global manufacturing, sales, and service organizations. We have the knowledge and resources to assist these businesses.

## How We Do It

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We have a unique ability to identify opportunities and add value to companies.

- Extensive background in analyzing and



understanding industrial businesses and strategies; we understand the key levers that will help a business accomplish its mission.



- Expertise in refining a business' strategy, identifying key initiatives, and driving implementation.
- We are not day-to-day managers.

Our established relationships provide key competencies.

- Long-established relationships with expertise in industrial sales and marketing, policy deployment, operational effectiveness, and Asia strategies.
- Utilize our network to identify outside Board members with relevant experience and expertise.

This is the the Sodales® approach.

## Results



Our founder has led investments totaling over \$500 million in transaction value.

Transaction values from \$30 to \$250 million.

Cumulative IRR in excess of 30%.

- > OUR MISSION
- > OUR FOCUS
- > HOW WE DO IT
- > RESULTS

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# Our Values

## Integrity

Trust is critical to our ability to work together effectively, and integrity is essential to building trust. We will always “shoot straight” with you, even when the message is not easy. We expect you to do the same.



## Partnership



company's mission.

Management has company knowledge, industry experience, and know how that we do not have. We have decades of experience helping businesses fulfill their missions, and we have relationships that can help businesses achieve their goals. By building a trust-based partnership, together, we can fulfill the

## People

People are a company's most important resource. A company can only succeed with and through its employees. A company cannot achieve its mission unless its employees all understand and buy into that mission, and they work together as a team to achieve agreed-upon goals. The company owes it to its employees to grow revenue and maximize profitability and capital efficiency. These



employees to grow revenue and maximize profitability and capital efficiency. These achievements allow the company to promote its employees and to employ more people from the company's communities. Respecting employees also requires that the company provide a safe work environment.

› INTEGRITY

› PARTNERSHIP

› PEOPLE

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# INVESTMENT APPROACH



We only invest in middle market and lower middle market manufacturing and industrial service businesses where we can bring our knowledge and relationships to bear to add more value than other prospective investors.



Investment Philosophy

[Learn More](#)



Investment Criteria

[Learn More](#)



Key Competencies

[Learn More](#)

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# Investment Philosophy

[History of Private Equity](#)[Selecting a Buyer](#)[Sodales® Approach](#)

Private equity investors have existed for decades, because they have pursued investment approaches that corporate buyers either could not pursue or were not willing to pursue.

Those investment approaches have grown and developed over the decades that private equity has flourished.

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# Investment Philosophy

[History of Private Equity](#)[Selecting a Buyer](#)[Sodales® Approach](#)

Today, most private equity investors are focused on working with management teams to maximize the value of their companies. The questions for sellers and management teams are:

- Can the management team form a trust-based partnership with the private equity investor?
- Can the private equity investor really help the company achieve more than it would have absent the private equity investor's involvement? Is the private equity investor the "natural" investor in *THIS* business?
- Can the seller trust the private equity investor to act with integrity and candor during the intensive and stressful investment process?



Sodales Partners and its affiliated resources offer the intelligence, knowledge, and trustworthiness to help you achieve your business mission and maximize the value of your business.

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# Investment Philosophy

[History of Private Equity](#)[Selecting a Buyer](#)[Sodales® Approach](#)

Sodales Partners seeks investments only in those businesses for which it is the “natural” investor. We can only be successful if we can add more value to the company than other potential investors.

Sodales Partners believes in building a reputation for the long term. Life is long. People have long memories. In every interaction, we act with honor and integrity, and we seek to leave a positive and lasting impression on every person with whom we interact.

We are building the strongest reputation in the private equity industry, one interaction at a time. Our goal is to be sought out for our value added, our judgment, our expertise, our integrity, and the partnerships we build with management. These are the key elements of the Sodales® approach. [^](#)

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# Investment Criteria

## Investment Focus

## Financial Criteria

## Receptive Management Team

## Transaction Structure

- Make majority equity investments in middle market and lower middle market manufacturing and industrial service companies headquartered in the US or Canada.
- DO NOT invest in retail, apparel, consumer products, businesses subject to fad or fashion, healthcare services, media, telecom, information technology, or financial services.
- Seek a growing industry with relatively stable competitive dynamics.
- Seek a company with an attractive and defensible market position, promising growth prospects, and positive cash flow.
- Look for opportunities to add value – whether the company is well-run or underperforming.

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# Investment Criteria

Investment Focus

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Receptive Management Team

Transaction Structure

- \$20 – \$200 million in enterprise value.
- EBITDA of \$4 – 25 million.
- Equity investments of \$8 – \$70 million.

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# Investment Criteria

Investment Focus

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- Management teams that are open to partnering on strategic direction, organic growth initiatives, acquisitions, and operational effectiveness.
- Willing to supplement a team with one or two executives, but do not seek to make widespread changes.

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# Investment Criteria

Investment Focus

Financial Criteria

Receptive Management Team

Transaction Structure

- We are transaction structure agnostic.
- We focus on the industry, the company, the management team, and how we can help the company, not the transaction structure.
- We will do management buyouts, restructurings, public to privates, refinancings, or partial to full transfers of equity from family-owned businesses.

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# Key Competencies

## HOW WE IDENTIFY AND CAPTURE REVENUE GROWTH AND PROFIT IMPROVEMENT OPPORTUNITIES

### ■ Sales and Marketing - Institutionalizing a Revenue Generation Engine



- Sales and marketing is typically the greatest driver of value creation in manufacturing and industrial service businesses.
- We can assist with a breadth of sales and marketing opportunities from the tactical to the strategic, including selling techniques, sales force effectiveness, sales force compensation, channel strategies, geographic expansion, product line extensions, vertical integration, new market opportunity assessment, customer segmentation and targeting, pricing strategy, value proposition creation and refinement, and marketing strategy.
- We work with Blue Ridge Partners, an industrial, middle market, sales and marketing consulting firm. Sodales Partners personnel began working with Blue Ridge Partners over 10 years ago.
- Blue Ridge is one of the few sales and marketing consulting firms that is focused on industrial businesses.

### ■ Policy Deployment - Focusing Management and Business Resources



- Policy deployment is a tool used to set, pursue, and achieve organizational priorities.
  - Defines the strategy and evaluates competitive strengths and weaknesses.
  - Identifies the three to five, highest-priority, corporate initiatives and focuses management's efforts and our interactions on these key initiatives.
  - Identifies initiative leaders and teams, establishes quantified monthly goals, tracks progress, and establishes

accountability.

- Creates a culture of countermeasures, so that when a key initiative falls behind schedule, a recovery plan is implemented.
- We work with TBM to implement policy deployment. Sodales Partners personnel began working with TBM to implement policy deployment across many portfolio companies 15 years ago.
- TBM is staffed exclusively with former operating executives.

#### ■ Operational Efficiency - Implementing Lean Six Sigma



- Manufacturing and service efficiency is often a key driver of value creation in businesses with which we partner. Improving operational efficiency reduces costs, improves service levels, reduces waste and defects, increases on-time delivery, and improves safety, leading to market share gains.
- We utilize a Lean Six Sigma approach, because it is employee-driven and can transform an organization.
- We work with operating executives at TBM, a Lean Six Sigma consulting firm, to identify and capture operational efficiency opportunities. Sodales personnel began working with TBM 15 years ago.
- TBM is staffed exclusively with former operating executives.

#### ■ Asia Strategies - Creating Value-Added, Asia Relationships and Presence



- Sodales team members have worked with numerous Asian joint ventures and wholly-owned subsidiaries, and our knowledge partners have worked with dozens more.
- We can help companies source from Asia or establish subsidiaries to export from Asia and/or to serve Asian demand.
- We have relationships with knowledge partners who know how to navigate the business and political environments in China and other Eastern countries.

#### ■ Outside Board Members - Identifying Relevant Industry and Functional Experts







- In partnership with management, we select outside Board members for each company that provide experience and expertise that are instrumental to implementing the company's value creation plan and achieving its mission.
- We foster mentoring relationships between senior management and outside Board members both during and between Board meetings.
- Examples of outside Board members who have been engaged by Sodales personnel include:
  - The Chairman and CEO of Sundstrand (a \$2 billion public company), Executive Vice President of Illinois Tool Works, and a *Board Alert* Outstanding Director in the United States.
  - CEO of Modine Manufacturing (a \$1.8 billion public company).
  - CEO of Siegel-Roberts (a \$550 million private company) and division President of Eaton Corporation.
  - Senior marketing executive at Wilson Sporting Goods and Disney, as well as President of ACCO Office Products (a \$1 billion public company).
  - CEO of Esselte (a \$1 billion private company) and CEO of Wiremold (a \$400 million private company).
  - CEO of Adidas and senior executive of Duracell.

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# REPRESENTATIVE INVESTMENTS

Examples of the investments our team has made in manufacturing and industrial service businesses.

We invest across many industrial industries.



Multinational, industrial manufacturing company with four divisions in the following businesses: seating for off-road vehicles, motorcycles, and boats; automotive acoustical insulation; industrial brushes, buffs, and compounds; and metal stamped, formed, expanded, and perforated components and subassemblies. Jason operated 34 facilities throughout North America, South America, Europe, and Asia. Jason was acquired through a public-to-private transaction.

Designer and manufacturer of commercial, fitness equipment, including aerobic and strength equipment. StairMaster was a division of a publicly-held company acquired through an auction process.







Designer and manufacturer of premium, commercial treadmills. Quinton Treadmills was a divestiture of a line of business from a privately-held company acquired through a directly-negotiated transaction.

Manufacturer of perforated metal for liquid filtration, decorative lighting, and appliances. Arcor was a privately-held business acquired through an assignment-for-the-benefit-of-creditors auction.



Designer and manufacturer of visual identification products primarily for the North American market, including rubber stamps, page flags, ink rolls and ribbons, business cards, and custom interior signage. Identity Group was a privately-held business acquired through an auction process.

Compounder of commodity and specialty plastic resins with sales in Canada and the United States. AT Plastics was a Canadian, publicly-held business in which a significant and influential ownership position was established.



Market leading European manufacturer of buffs and compounds for industrial polishing. Lippert Unipol was a division of a publicly-held, German company acquired through a directly-negotiated transaction.

Market leading manufacturer of anti-slip walking surfaces for railcars, utilizing expanded metal. Morton was a privately-held business acquired through an auction process.



metal. Michigan was a privately-held business acquired through an auction process.

**MANUFACTURING COMPANY**



Custom designer and manufacturer of complex folding carton and single face laminate packaging solutions for the cosmetics, consumer products, and food and beverage end markets. Trojan Litho was a privately-held business acquired through an auction process.

Designer and manufacturer of operator seating for residential lawn care, materials handling, and other small, off-highway vehicles. Michigan Seat was a family-owned business acquired through a directly-negotiated transaction.



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# RESOURCES



People are a company's most important resource and its key to success.

Our people are the key to our ability to add value to your company. We bring exceptional knowledge and skills to bare for manufacturing and industrial service businesses.



Team

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Operating Advisors

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Knowledge Partners

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# Team

## 20 years of private equity experience with middle market and lower middle market manufacturing and industrial service businesses

- Architect of Saw Mill Capital's shift in strategy from power focused to manufacturing and industrial service focused; built firm capabilities in industrial sales and marketing and Lean Six Sigma.
- Completed multiple investments as an independent sponsor.

## Total transaction value exceeds \$500 million



- \$30-250 million in individual transaction value.
- Cumulative IRR in excess of 30%.
- Turned around multiple additional investments closed by others.

## Seven years of general management consulting experience

- McKinsey & Company, Atlanta Office.
- Focused on acquisitions, restructurings, and turnarounds.

## Graduate degrees in business, engineering, and law

- Undergraduate and graduate engineering degrees from Thayer School of Engineering, Dartmouth College – *Summa Cum Laude* and *Phi Beta Kappa* (junior year).
- MBA from Darden School of Business, University of Virginia – Shermet Scholar.
- JD from University of Virginia School of Law – Order of the Coif.

**Sodales Partners' Operating Advisors and Knowledge Partners are also in integral part of the team**



John J. Shaia

FOUNDER & MANAGING DIRECTOR

[jshaia@sodalespartners.com](mailto:jshaia@sodalespartners.com)

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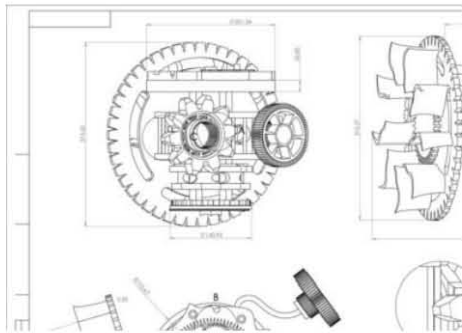
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# Operating Advisors

## Robert Jenkins

Bob is recognized as an exceptional general manager and as a premier Director of both public and private manufacturing companies. He was selected by *Board Alert* as one of the seven Outstanding Directors in the United States in 2003.



Bob was the Chairman, President, and CEO of Sundstrand, a diversified international company and the leading global supplier of aircraft electric generating systems for the aerospace industry. He was also Executive Vice President of Illinois Tool Works Inc. and began his career with E. I. Du Pont de Nemours & Co. Bob has sat on 11 public and private company Boards, including AK Steel Holding Corporation, Visteon Corporation, Solutia Inc., and ACCO Brands Corporation. He has also sat on seven non-profit Boards and has been a member of the Board of Trustees of both the Manufacturers Alliance and the National Association of Manufacturers.

Bob graduated from University of Wisconsin-Madison with a Bachelor of Science in Business Administration.

## David Cataldi

Dave is committed to leveraging value propositions to drive organic growth and implementing Lean manufacturing to attain operational excellence.

Dave is the President of PCS Company, which is focused on providing leading technologies for the injection molding and die cast industries. Prior to PCS Company, Dave was the President of a Tier 1 automotive supplier in the North American and European markets for eleven years. Under his leadership, the business was transformed from a materials supplier to a Tier 1 supplier through aggressive restructuring and expansion into new product categories. Earlier in his career, Dave worked for eighteen years at Textron's Automotive Unit across a range of product groups with increasing levels of responsibility, becoming Executive Vice President North American Operations, Kautex.

Dave holds a Master of Business Administration from Southern New Hampshire University and a Bachelor of Engineering in Industrial Engineering from Youngstown State University.

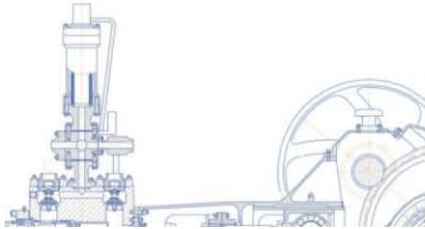


### Peter Coyne

Pete has extensive experience as a general manager, operating executive, and private equity investment professional. Pete's core competencies include global supply chain management, Lean manufacturing, and strategic planning.

Currently, Pete is the Senior Vice President and General Manager for OMG Roofing Products, a leading manufacturer and global supplier of high-performance products and services for the commercial roofing industry. He has also held operations leadership roles at Steel Partners, Gulftech International, Crane Co., and Danaher Corporation. He has held investment professional positions in private equity at Saw Mill Capital and Mellon Ventures.

Pete earned a Bachelor of Science in Chemistry from The College of William and Mary and a Master of Business Administration from the Darden School of Business at the University of Virginia.

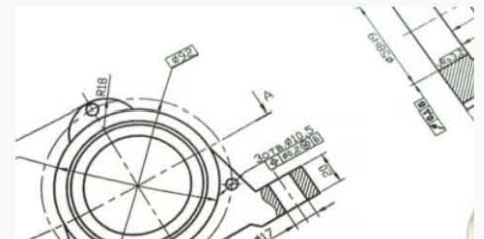


### Patrick Spear

Patrick has had a long and successful career creating revenue growth strategies for middle market and publicly-held businesses. He has expertise identifying and quantifying new market opportunities and pursuing those opportunities by fostering collaboration among parties with different capabilities to achieve shared goals.

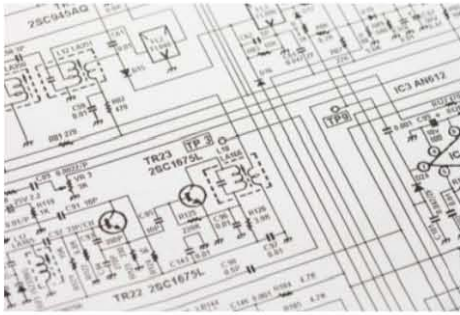
Patrick is the President and CEO of Global Market Development Center (GMDC), a Colorado Springs-based non-profit trade association. GMDC connects retailers, wholesalers, suppliers, and service/solution companies in the general merchandise and health/beauty/wellness marketplaces. Patrick began his career with Bic Corporation and also served as an executive with Newell Rubbermaid, Mapa Spontex, and The Highlands Group. He was CEO of Identity Group and the Founding Partner/Managing Director of Mammoth Office Products.

Patrick holds Bachelor of Arts degrees in Economics and Environmental Studies from the University of California at Santa Barbara and a Master of Business Administration from the University of San Diego. Patrick is also an Eagle Scout and a graduate of the Colorado Outward Bound School.



### Jerry Boll

Jerry provides business improvement services to manufacturing and service organizations. Jerry also has expertise in mergers, acquisitions, and integrations.



organizations. Jerry also has expertise in mergers, acquisitions, and integrations.

Jerry currently works as a consultant to middle market manufacturing and industrial service businesses. Jerry previously held senior general management positions with ER Wagner (a manufacturer of custom vehicle components and engineered, high-performance casters and hinges), Jason, Inc as President of Milsco (a global manufacturer of seating for motorcycles, boats, and off-road vehicles from riding lawn mowers to construction and agricultural equipment), The Manitowoc Company (a manufacturer of food service equipment and cranes and lifting solutions), and Fiskars (a global manufacturer of cutting tools).

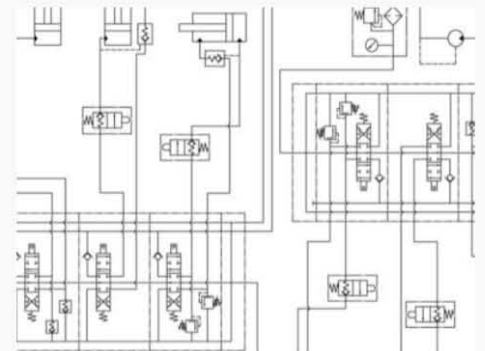
Jerry graduated *Cum Laude* with a Bachelor of Business Administration from the University of Wisconsin Whitewater and earned a Master of Business Administration with honors from Marquette University.

### Srivas Prasad

Srivas has expertise creating and executing performance improvement plans in middle market, private and publicly-held, global, manufacturing companies through strategic planning, pricing, product development, global supply chain management, operating performance improvement, and production facility consolidation.

Srivas was recently the Senior Vice President and General Manager of Janesville Acoustics, a division of Jason, Inc. Janesville is a Tier I automotive supplier of nonwoven fiber products for various applications throughout passenger vehicles. Srivas has also held general management positions at a seating manufacturer for off-road vehicles and at multiple divisions of Textron. Additionally, he has been the Vice President of Business Development at Jason, Inc.

Srivas holds a Bachelor of Engineering degree from Bangalore University in India and a Master of Engineering degree from Lamar University. He also completed the Textron Executive Leadership Program.



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# Knowledge Partners



**BLUE RIDGE PARTNERS**  
The Revenue Engine

Blue Ridge Partners is recognized as the most experienced, impactful, and respected firm that is exclusively focused on helping companies accelerate profitable revenue growth. Blue Ridge Partners has extensive experience with profitable revenue growth in manufacturing and industrial service businesses.

TBM specializes in operations and supply chain consulting for manufacturers and distributors. TBM pushes the pedal down in your operations to make you more agile and help you accelerate business performance 3-5 times faster than your peers.



Dennis Sheehan has extensive experience assisting Eastern and Middle Eastern governments in structuring their business economies, as well as a wealth of experience guiding businesses in navigating those business economies. Dennis founded the first New York non-vessel operating common carrier and established ocean carrier service between the US and Libya. He then assisted the Libyan government in introducing circle irrigation and building 25 miles of greenhouses to transform its agricultural sector. In the 1980's, he served as a personal consultant to Deng Xiaoping in China, modernizing the Chinese cement industry, writing the precursor to the current "The Joint Venture Rules and Regulations of the PRC," and helping establish 14 economic zones. In the late 1990's,

Dennis met Mikhail Gorbachev and agreed to relocate to Russia to assist in the privatization of farm collectives. He then assisted the Mayor of St. Petersburg, Anatoly Sobchak, in privatizing and modernizing the medical school system, ultimately becoming the Dean of three Russian medical schools. Dennis is currently the CEO of IDP Labs, a coatings and cleaning chemicals manufacturer serving major hospitals, airports, nursing homes, supermarket chains, and automotive OEMs.

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# PRIVACY POLICY

Last modified: September 6, 2019

## Introduction

Sodales Partners ("**Company**" or "**We**") respects your privacy and is committed to protecting it through its compliance with this policy.

This policy describes the types of information we may collect from you or that you may provide when you visit the website <https://sodalespartners.com> (our "**Website**") and our practices for collecting, using, maintaining, protecting, and disclosing that information.

This policy applies to information we collect:

- On this Website.
- In email, text, and other electronic messages between you and this Website.

It does not apply to information collected by:

- Us offline or through any other means, including on any other website operated by Company or any third party; or
- Any third party, including through any application or content (including advertising) that may link to or be accessible from or on the Website.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Website. By accessing or using this Website, you agree to this 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 to be acceptance of those changes, so please check the policy periodically for updates.

## Children Under the Age of 13

Our Website is not intended for children under 13 years of age. No one under age 13 may provide any information to or on the Website. We do not knowingly collect personal information from children under 13. If you are under 13, do not use or provide any information on this Website or on or through any of its features. 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:

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## Information We Collect About You and How We Collect It

We collect several types of information from and about users of our Website, including information:

- By which you may be personally identified, such as name, postal address, e-mail address, telephone number, or any other identifier by which you may be contacted online or offline ("**personal information**");
- That is about you but individually does not identify you; and/or
- About your internet connection, the equipment you use to access our Website, and usage details.

We collect this information:

- Directly from you when you provide it to us.
- Automatically as you navigate through the site. Information collected automatically may include usage details, IP addresses, and information collected through cookies, web beacons, and other tracking technologies.

## Information You Provide to Us

The information we collect on or through our Website may include:

- Information that you provide by filling in forms on our Website. This includes information provided at the time of registering to use our Website, subscribing to our service, posting material, or requesting further services. We may also ask you for information when you report a problem with our Website.
- Records and copies of your correspondence (including email addresses), if you contact us.
- Your search queries on the Website.

## Information We Collect Through Automatic Data Collection Technologies

As you navigate through and interact with our Website, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- Details of your visits to our Website, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Website.
- Information about your computer and internet connection, including your IP address, operating system, and browser type.

The information we collect automatically may include personal information. It helps us to improve our Website and to deliver a better and more personalized service, including by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Website according to your individual interests.
- Speed up your searches.
- Recognize you when you return to our Website.

The technologies we use for this automatic data collection may include:

- **Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website.
- **Flash Cookies.** Certain features of our Website may use local stored objects (or Flash cookies) to collect and store information about



your preferences and navigation to, from, and on our Website. Flash cookies are not managed by the same browser settings as are used for browser cookies. For information about managing your privacy and security settings for Flash cookies, see **Choices About How We Use and Disclose Your Information**.

- **Web Beacons.** Pages of our Website and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

## How We Use Your Information

We use information that we collect about you or that you provide to us, including any personal information:

- To present our Website and its contents to you.
- To provide you with information, products, or services that you request from us.
- To fulfill any other purpose for which you provide it.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- To notify you about changes to our Website or any products or services we offer or provide through it.
- In any other way we may describe when you provide the information.
- For any other purpose with your consent.

We may also use your information to contact you about goods and services that may be of interest to you. For more information, see **Choices About How We Use and Disclose Your Information**.

## Disclosure of Your Information

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may disclose personal information that we collect or you provide as described in this privacy policy:

- To our subsidiaries and affiliates.
- To contractors, service providers, and other third parties we use to support our business and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Sodales Partners' assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by Sodales Partners about our Website users is among the assets transferred.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- With your consent.

We may also disclose your personal information:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce or apply any agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Sodales Partners, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

## Choices About How We Use and Disclose Your Information

We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:

- **Tracking Technologies and Advertising.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe's [website](#). If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly.

We do not control third parties' collection or use of your information to serve interest-based advertising. However these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt out of receiving targeted ads from members of the Network Advertising Initiative ("NAI") on the NAI's [website](#).

## Changes to Our Privacy Policy

It is our policy to post any changes we make to our privacy policy on this page. If we make material changes to how we treat our users' personal information, we will notify you through a notice on the Website home page. The date the privacy policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our Website and this privacy policy to check for any changes.

### Contact Information

To ask questions or comment about this privacy policy and our privacy practices, contact us at:

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