

# Privacy Policy

*Updated December 23, 2024*

## **Your Privacy is Important to Us**

CrowdFunz Capital LLC ("CrowdFunz," "we" or "us"), values your privacy. We makes it a priority to protect the privacy of the visitors ("User" or "you" and collectively "Users") to our website. The following policies apply to the collection of data by CrowdFunz and its subsidiaries and affiliates. If you have questions or concerns regarding this statement, please contact us at [info@crowdfunz.com](mailto:info@crowdfunz.com).

This policy discloses what information we collect and how we use it, as well as the choices you can make about the way your information is collected and used. We also explain how any personal or personally identifiable information that we may request will be used. We also detail below our security policy, which describes how your personal information is protected.

## **Our Pledge to You**

We are required by law and regulatory bodies to ask for certain information in order to provide our Services to you. CrowdFunz makes commercially reasonable best efforts to maintain the confidentiality, integrity and security of our clients' personal information. Keeping client information secure, and using it only as our Users want us to, are matters of principle for all of us at CrowdFunz. With this in mind, here is our commitment to each and every User:

- Except as you may otherwise expressly approve, we will limit the collection and use of client and user information to what we believe would be useful to service your accounts, administer our business, or to
- tell you about our Services;
- We will restrict employee access to client and user information to those who need to know in order to provide Services to you;
- We will educate our employees according to our internal policies to reinforce the importance of confidentiality and client and user privacy;
- We will maintain commercial reasonable and customary security standards and procedures to protect information about you;

- We will respond quickly to your request to correct inaccurate information.

### **Information We Collect From You and About You**

We are required by law and regulatory bodies to collect personal and financial information from you while you navigate and use our website, although some are optional information. By accessing the Services, registering as a user, using our Service or by otherwise submitting your personal information to us, you give your consent to the collection and use of personal information as explained in this policy.

In general we collect the following types of information from you: including but not limited to a) Personal data required to verify your identity; b) Personal and financial data necessary to assess your eligibility to invest on the CrowdFonz platform c) Information about your visits to and use of the Site to help us maintain the appropriate features, functionality and user experience.

When you subscribe to make an investment in one of the opportunities listed on the site, you will again be asked for some of the same personal data as well as some additional data, such as your bank routing number and bank account number. This data is needed in order to enable us or our broker-dealer partners to utilize your bank account to originate funds transfers and later to make any investment disbursements to you.

In addition, we gather names and email addresses of users who contact us through the Site with questions about our company or our investment platform. We collect this information for the sole purpose of responding to such inquiries and do not store the contact information unless requested by these people. Similarly, we gather names and email addresses of job applicants who submit resumes to conduct further communications.

Finally, we collect information about your computer and your visits to the Site, such as your IP address, geographical location, browser type, referral source, length of visit, and page views through the use of log files. We use this aggregated information in the administration of the Site to improve its usability and to evaluate the success of particular marketing and advertising campaigns, search engine optimization strategies and other marketing activities. We use non-identifying and aggregated information to help optimize the Site based on the needs of our users.

## **Notifications and Communications From Our Site**

We will send you email notifications from time to time. Such notifications are required elements of your transactions on our platform, such as confirmations of particular actions you have taken. These required notices are sent typically to notify you of a change in status such as when you are confirmed as an investor, or for legal or security purposes. For example, certain notifications are sent for your own protection to ensure that another person cannot make a change to your account without your knowledge. In other cases, these notifications involve changes to various legal agreements or Site policies. Generally, you may not opt out of such service-related emails.

When you register as an investor, you will receive emails that confirm specific actions you requested; these will include emails to which you must respond to complete your registration, and notifications confirming your registration. Thereafter, you will receive emails when a new investment opportunity is offered, as well as updates concerning the progress of the funding of such opportunity or offering other relevant information. If you make an investment through the Site, we will also send you confirmations of the investment and occasional updates as to the status of that investment and the timing of distributions relating to that investment. We may also send you responses to emails you send us, if appropriate. From time to time, we may also send user surveys, requests for user feedback regarding user experience and Site operations or marketing offers from us or from us on behalf of our marketing partners. The completion of these surveys or requests for feedback or acceptance of any offer is strictly voluntary. If you do not wish to receive these offers, surveys or user feedback emails, please opt out in any offer email you receive from us.

## **Updates and Changes to Privacy Policy**

In the event of a change in this policy, a revised Privacy Policy will promptly be posted to our Website, and the “Updated” date will be changed. If the revised Privacy Policy contains a material change to how we collect or use personal information, notice of the change will be emailed to you or posted on the Website’s home page. Please revisit this page to familiarize yourself with changes to the Privacy Policy. You agree to accept posting of a revised Privacy Policy as described herein as actual notice to you of such revised Privacy Policy. Your continued use of the Services after such posting constitute

to the collection and use of your information as described in the then-current Privacy Policy.

## **How Information Helps Both You and Us**

Our mission at CrowdFunz is to provide you with exceptional investment opportunities to match your individual investment goals. Information about you and your accounts plays a key role in our ability to succeed in this mission. It also helps us service your accounts and administer our business. For example, we use information about you to:

- Provide you with the Services available through the Website;
- Establish and set up your account, issue an account number, and maintain your transaction history;
- Respond more accurately and efficiently to your requests;
- Identify opportunities to give you more convenience and control by developing new services that may benefit you;
- Verify your identity and contact information to help protect you and CrowdFunz from fraud;
- Comply with certain legal and regulatory requirements.

We generally use the information that you provide or that we collect to establish and enhance our relationship with you, and to operate, maintain, enhance, and provide the Services and the Website. We may use such information to periodically provide you with information, newsletters or offers about features and services available through the Services that may be of interest to you. We may also send information or offers to groups of Users on behalf of other Users or third parties. However, you will have the option to opt out of receiving such information.

We use aggregated information provided by or collected from our Users to understand and analyze the usage trends and preferences of our Users, to improve the way the Services and the Website work and look, and to create new features and functionality. We may use aggregated information about our Users' investments to generate statistics and maps that we deem helpful in the provision of the Services or any part thereof. We do not and will not sell analytics about our users without written consent from the user.

As you browse CrowdFunz and other websites, online ad networks we work with may place anonymous cookies on your computer, and use similar technologies, in order to

understand your interests based on your (anonymous) online activities, and thus to tailor more relevant ads to you. If you do not wish to receive such tailored advertising, email [marketing@CrowdFunz.com](mailto:marketing@CrowdFunz.com) to opt out of most companies that engage in such advertising. (This will not prevent you from seeing ads; the ads simply will not be delivered through these targeting methods.)

## **Sharing Your Information with Others**

We allow you to share certain information with other Users of the Services. You can share your Profile with all other Users, or only with such other Users as are designated by you. You are not required to share your Profile or any other information with other Users. If you do share your Profile, anyone you designate will be able to see what companies you are following and investing in. If you indicate an interest in making an investment through the Services, such as indicating an interest to buy equity or make a loan in a particular private real estate company, we will notify the party or parties offering the investment (the “Issuer”) of your interest and may notify other Users with whom you have chosen to share information. By indicating an interest in an investment and/or sharing your Profile with other Users, you consent to this disclosure of your information. We may also collect and store information, which could include Non-Personally Identifiable Information or Personally Identifiable Information, locally on your computer or device using mechanisms such as browser web storage or application data caches.

## **Social Media Features**

You can log in to the Website using services such as LinkedIn or Facebook Connect. These services will authenticate your identity and provide you the option to share certain personal information with us such as your name and email address to pre-populate our sign up form. Services like Facebook Connect give you the option to post information about your activities on this Website to your profile page to share with others within your network.

Our Website also includes Social Media Features such as the Facebook Like button, Twitter and Wechat share buttons. These Features are interactive mini-programs and may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the feature to function properly. Social media features and widgets are

either hosted by a third party or hosted directly on our Website. Your interactions with these Features are governed by the privacy policy of the company providing them.

### **Discloses Your Information to Third Parties**

We limit the sharing of personal information outside CrowdFunz. We do not sell, license, lease, or otherwise disclose your personal information to third parties, except as noted below:

We may disclose your personal information when such disclosure is legally required or appropriate pursuant to any court orders, subpoenas or any regulations, including responding to court orders and subpoenas, cooperating with government agencies, other regulatory bodies, and law enforcement officials, performing background checks, resolving disputes or performing risk-management functions.

To help us improve our Services, we may engage third parties to help us to carry out certain internal functions such as information management, account processing, client services, or other data collection relevant to our business. Examples of the types of outside companies with which we may share information include non-financial companies that perform services for us, such as data processing, and companies that perform reporting, tax documentation, custody, title or escrow services on our behalf. Use of any personal information we share with these third parties is limited to the performance of the task we request. The third parties with which we share personal information are required to protect it in a manner similar to the way we protect your personal information.

In the event that CrowdFunz is acquired by or merged with a third-party entity, it reserves the right to transfer or assign the information that it has collected from its Users as part of such merger, acquisition, sale, or other change of control. In such cases, CrowdFunz will provide you notice before your personal information is transferred to and becomes subject to the privacy policy of a different entity.

We may also disclose your information as necessary to credit reporting or collection agencies, or when necessary to protect our rights or property.

We further reserve the right to disclose any of your personal information as we believe appropriate or necessary to take precautions against liability, to investigate and defend

against any third party claims or allegations, to assist government enforcement agencies, to protect the security or integrity of the Services, or to protect the rights, property or personal safety of CrowdFunz, its Users, Issuers, or others.

## **Security Statement**

We limit access to your personal information to those employees who have a legitimate business need to access such information to provide you with the Services. In keeping with industry standards and practices, we maintain commercial reasonable physical, electronic and procedural safeguards and controls to protect your information. The Website is built upon a secure infrastructure with multiple layers of protection and we use industry standard encryption technologies to safeguard your information.

Users are required to identify and authenticate themselves prior to accessing restricted portions of the Services. Generally, identification and authentication take place through the use of your user name and a password and/or while logging in with one of our technical support staff. You are responsible for keeping your password confidential.

We have security standards and procedures in place designed to prevent unauthorized access to your accounts and personal information. A key part of this process helps ensure that all information we have about you is accurate and up-to-date. If you ever discover inaccuracies in our data or if your personal information changes, notify us (**Help@CrowdFunz.com** ) immediately.

The transmission of information via the Internet is not completely secure, and for this reason we cannot guarantee the security of information sent to us electronically. If we learn of a security systems breach, we may attempt to notify you electronically so that you can take appropriate protective steps. We may also post a notice on or through the Website and the Services in the event of a security breach. Depending on where you live, you may have a legal right to receive notice of a security breach in writing.

## **Vulnerability Reporting Policy**

The CrowdFunz.com security team acknowledges the valuable role that independent security researchers play in Internet security. Keeping our customers' data secure is our number-one priority, and we encourage responsible reporting of any vulnerabilities that

may be found in our site or application. CrowdFunz.com is committed to working with the security community to verify and respond to any potential vulnerabilities that are reported to us.

- Reporting a Potential Security Vulnerability: (a) Privately share details of the suspected vulnerability with CrowdFunz.com by sending an email to **Help@CrowdFunz.com** (b) Provide full details of the suspected vulnerability so the CrowdFunz.com security team may validate and reproduce the issue
- CrowdFunz.com does not permit the following types of security research:
  - (a) Causing, or attempting to cause, a Denial of Service (DoS) condition.
  - (b) Accessing, or attempting to access, data or information that does not belong to you.
  - (c) Destroying or corrupting, or attempting to destroy or corrupt, data or information that does not belong to you.

## Opt-out Policy

We may at times send you e-mail communications with marketing or promotional materials. If you prefer not to receive such marketing or promotional e-mails from us, you may unsubscribe completely by emailing us at: **Help@CrowdFunz.com**

Please note that opt-out requests may take up to twenty-four (24) hours to process. Please also note that at times we may need to send you e-mail communications that are transactional in nature such as service or termination announcements or payment confirmations which are communications you will not be able to opt-out of.

You will be able to modify the information concerning your account by visiting your profile page and editing any information you wish to change. You will be able to change your e-mail address, password, contact information, or other login information by visiting your account's settings page subject to our website policy. If you wish to delete your account or need help modifying account information, please contact us a **Help@CrowdFunz.com**. We will require up to twenty-four hours (24) to process such requests.

Through your account settings you will be able to set certain preferences and permissions regarding the visibility of your information, including Non-Personally Identifiable Information or Personally Identifiable Information, to others. You may stop or restrict the placement of CrowdFunz cookies, Google's cookies and third party cookies on your computer by adjusting your web browser preferences or a "Do Not Track" setting in your web browser. If you do so, you may still use our website, but this may interfere with some of its functionality.

We are not responsible for removing your Personally Identifiable Information from the lists of any Third Party Services or other third party who has previously been provided your information in accordance with this notice.

### **Reviewing, Changing or Correcting Information**

You are solely responsible for helping us to maintain the accuracy and completeness of your personal and other information. We urge you to review your information regularly to ensure that it is correct and complete. If

you believe that any of your information is incorrect, or if you have any questions regarding this Privacy Policy, please contact us (<http://www.CrowdFunz.com/contact/>).

You may, of course, decline to share any or all of your personal information with us or ask us to delete your personal information from our systems at any time, in which case we may not be able to provide to you some of the features and functionality found on or through the Website and the Services.

You may also clear cookies from your computer via your web browser settings. You may also wish to use a Google Analytics opt-out web browser add-on. Information on this option is available at:

<http://support.google.com/analytics/bin/answer.py?hl=en&answer=2700409>

If you would like us to remove your Personally Identifiable Information from our database, please send a request to: **Help@CrowdFunz.com**.

### **An Ongoing Commitment to Your Privacy**

We are committed to protecting the privacy of our former clients as well as our current clients. If you choose to become an inactive client, you will continue to be protected by the policies and principles described in this Privacy Policy for as long as your personal information is retained by us. Should you close your account with us, we will only retain your personal information for as long as necessary to comply with any applicable legal or regulatory requirements.

### **International Visitors**

The Services may be accessed and/or used by Users located outside the United States in accordance with our Terms of Use and other policies and procedures posted on the Website. If you choose to use the Services from the European Union or other regions of the world with laws governing data collection and use that may differ from U.S. law, then please note that you are transferring your personal information outside of those regions to the United States and by providing your personal information on or through the Services you consent to that transfer.

### **Children's Privacy Policy**

The CrowdFunz website is not intended for use by children, especially those under eighteen (18) years of age. No one under eighteen (18) years of age is allowed to use the website, provide any personal information or receive our email distributions. We do not knowingly solicit or collect Personally Identifiable Information from children under the age of thirteen (13) or anyone under eighteen years of age. If you believe that a minor has disclosed Personally Identifiable Information to CrowdFunz, please report this to us immediately by emailing us at: **Help@CrowdFunz.com**.

### **Applicable Law and Jurisdiction**

The Website is maintained in the United States of America. By accessing the CrowdFunz website, you consent to and authorize the export of Personally Identifiable Information to the United States of America and its storage and use as specified in this Privacy Notice.

This Privacy Notice shall be governed by, construed and entered in accordance with the laws of the State of New York applicable to contracts deemed to be made within such state, without regard to choice of law or conflict of law provisions thereof. All disputes

with respect to this Privacy Notice shall be brought and heard either in the New York State Courts located in Manhattan, New York, or the federal district court for the Southern District of New York. You consent to the in personam jurisdiction and venue of such courts. YOU HEREBY WAIVE YOUR RIGHT TO A TRIAL BY JURY WITH RESPECT TO ANY CLAIM, ACTION OR PROCEEDING, DIRECTLY OR INDIRECTLY, ARISING OUT OF, OR RELATING TO, THIS AGREEMENT TO THE FULLEST EXTENT PERMITTED BY LAW.

### **Contact Information**

Please contact CrowdFunz with any questions or comments about this Privacy Policy, your personal information, or your choices with regards to our collection and use of your personal information, by completing our contact form (<https://www.CrowdFunz.com/contact/>) or email at **info@CrowdFunz.com**.