

PRIVACY POLICY
Last Updated: March 23, 2026

Fundify Portal, LLC, an SEC-registered funding portal and funding portal member of FINRA (“Fundify Portal,” “we,” “us,” or “our”), know that data privacy is very important to you. This privacy policy (the “Privacy Policy”) describes what the types of personal information we may collect through:

- Our website (located at www.fundifyportal.com) (the “Platform”);
- Any other website, application, or digital property that links to this Privacy Policy; and
- Your interactions with us by any other means.

In this Privacy Policy, a “user” or “you” refers to: (i) visitors of the Platform, or any other website, web application, or digital property that links to this Privacy Policy; (ii) individuals who interact with Fundify Portal and/or the services available via the Platform (the “Services”); and (iii) individuals who create an account on the Platform, including “Issuers” and “Investors” (collectively, “Users”).

By accepting this Privacy Policy, accessing, or using the Platform, the Services, or otherwise manifesting your assent to this Privacy Policy, you agree to be bound by this Privacy Policy and the accompanying Terms of Use (located at <https://www.fundifyportal.com/legal/terms>). If you are accepting this Privacy Policy on behalf of your employer or another organization, you hereby represent and warrant that you are authorized to bind such party to the terms of this Privacy Policy. If you do not agree to (or cannot comply with) all of the terms of this Privacy Policy, you may not access or use the Platform or the Services.

Capitalized terms not defined in this Privacy Policy have the meanings set forth in our Terms of Use.

This Privacy Policy will help you understand the following:

I. INFORMATION WE COLLECT AND RECEIVE

In the course of operating the Platform, providing the Services and/or interacting with you, Fundify Portal collects and/or receives the following types of information, which may include personal information.

1. Contact Information

We collect contact information through the Platform and Services, which typically includes your name, email address, phone number, and any information you provide in messages to us (“Contact Information”). We use Contact Information for purposes such as providing information about the Services, responding to your inquiries, sending you email alerts (including marketing emails), or providing you with the Services.

2. Account Information

To access and use our Services, you must successfully open an account with Fundify Portal (an “Account”). In order to open an Account, you will be required to provide certain information in addition to Contact Information including your date of birth, country of birth, nationality, government-issued identification (e.g., passport or driver’s license), Social Security Number or Tax ID, gender, marital status, photo, employer name and address, beneficiary information (including beneficiaries’ names, birth dates, and

Social Security Numbers), financial information such as bank account and payment card details, suitability information, income, revenue, and other sources of funds, account balance, credit scores, tax information and other information about your financial situation, investment objectives, stock restrictions, approximate net worth, and risk preferences and tolerance.

3. Information obtained automatically from your online activity

When you access or use the Platform and/or Services, we use browser cookies, pixels, web server logs, web beacons, and similar technologies (collectively, “Tracking Technologies”) to automatically collect or receive certain standard technical information and other data (such as traffic data, location data, logs and other communications data) sent to us by your computer, mobile device, tablet, or other device over time on our Platform, and your online activity across third party websites, apps, and devices. We may also evaluate your computer, mobile phone, or other access device to identify any malicious software or activity that may affect the availability of our Platform and Services.

When you access or use the Platform and/or Services, advertising companies, analytics networks and providers, and other third parties may use Tracking Technologies to collect information about your online activities over time and across different websites, applications, online services, websites, and devices.

The data we or third parties collect automatically may include personal information and/or statistical data that may not identify you personally; however, we or third parties may maintain, combine, or associate it with personal information collected in other ways or received from third parties. We and/or third parties use this information to (i) enhance the performance and functionality of our Platform and/or Services; (ii) personalize your experience with them, understand how you use our Platform and/or Services, maintain a persistent session, and improve and further develop our Platform and/or Services; and (iii) serve targeted and other advertising, measure how the ads perform, and for analytics purposes.

The Tracking Technologies used on the Platform and Services include the following, among others:

- *Cookies:* Cookies are small packets of data that a website stores on your computer’s hard drive so that your computer will “remember” information about your visit. We may use both session cookies (which expire when you close your browser) and persistent cookies (which remain on your computer until deleted) to authenticate users, provide content of interest to you, analyze feature usage, and measure and optimize advertising and promotional effectiveness.
- *Local Storage Technologies:* We may use local storage technologies, such as HTML5, that provide cookie-equivalent functionality but can store larger amounts of data on your device outside of your browser in connection with specific applications.
- *Web Beacons:* We use web beacons, also known as pixel tags or clear GIFs, to demonstrate that a webpage or email address was accessed or opened, or that certain content was viewed or clicked.
- *Third-Party Sites:* When access to the Platform and/or Services is made available to you through third-party sites, such as social media platforms, please be aware that these websites maintain their own policies regarding Tracking Technologies and the collection and use of information. You are responsible for reviewing those policies.

4. Information Obtained From Third-Party Analytics Services

We may use third-party analytics services (such as Google Analytics) to evaluate your access and use of the Platform and the Services, compile reports on activity, collect demographic data, analyze performance metrics, and collect and evaluate other information relating to device and internet usage. These third-party analytics services use cookies and other Tracking Technologies to help analyze and provide us with data. By accessing or using any of the Platform and/or Services, you consent to the processing of data about you by these analytics providers in the manner and for the purposes set out in this Privacy Policy.

We may add to or change these third-party analytics services from time to time. If you opt out of any service, you may not be able to use the full functionality of the Platform or the Services. For more information on Google Analytics, including how to opt out from certain data collection, please visit <https://www.google.com/analytics>

5. Information Obtained From Other Sources

Social Media: We maintain a presence on LinkedIn, Facebook, X, and other social media and third-party sites. We may collect personal information when you visit or use social media, including when you access our Platform or Services from social media. We will do so in accordance with the terms of use and privacy policies of those sites, and applicable law. Personal information may also be collected by the third-party social media sites that host our social media pages, which may provide aggregate information and analysis to us about visitors' use of our social media pages. This Privacy Policy does not cover personal information collected by such third-party social media sites.

Service Providers: We may collect or receive your personal information from third party service providers such as credit bureaus and service providers (e.g., providers of Anti-Money Laundering ("AML") service providers and Know Your Customer ("KYC") service providers).

Government and Public Sources: As permitted by applicable law, we may collect or receive your personal information from publicly available government records, directories, and sources such as courts, tax authorities, government agencies, regulatory authorities, and law enforcement.

Inferences: We may collect or receive inferences drawn from your information to create a profile that may include your preferences, characteristics, predispositions, behavior, attitudes, and aptitudes.

6. Payment Information

In connection with your use of the Services, you may be required to provide our third-party payment services provider(s) (each a "Payment Services Provider") with certain credit or debit card information, ACH transfer information or wiring instructions (collectively, the "Payment Information"). We do not store or otherwise process the Payment Information directly. Our Payment Services Provider(s) will collect on our behalf information about your payment for Services ("Transaction Information"). By using the Services, you acknowledge and agree that if and to the extent your Payment Information, Transaction Information, and/or any other information is collected by or transferred to any Payment Services Provider is governed by its applicable privacy policy, and you expressly agree to the terms of such privacy policy. You hereby expressly grant us the right, power, and authority to access and transmit your information as reasonably necessary for the Payment Services Provider(s) to provide their services to you in connection with your use of our Services.

II. INFORMATION USE AND SHARING

We may use and share your personal information for the following purposes:

- Account onboarding and creation;
- Identify verification, credit checks, AML and KYC verification, and other due diligence efforts when you use the Services;
- Providing the Services, including servicing, maintaining and protecting your Account, and processing transactions;
- Monitoring, supporting, analyzing, and improving the Services;
- Communicating with you regarding the Services and your Account;
- Fulfilling your requests for information regarding new or improved products and services;
- Marketing, advertising, and tracking activities, and evaluating the efficacy of our efforts, provided that, where required under applicable law, we will obtain your prior opt-in consent to send electronic marketing communications and/or our newsletter;
- Research, project planning, troubleshooting problems, and detecting and protecting against error, fraud, or other criminal activity;
- Protecting the safety and security of our Services, businesses, and Users;
- Disclosing to third-party contractors and service providers that provide services to us in the operation of our business and assistance with the Services, such as technical support for the Platform, servicing User account(s), and providing services such as administrators, custodians, marketing and advertising companies, Payment Services Providers, consulting service organizations, and IT and cloud service providers, among others;
- Disclosing to Issuers and companies you invest in, including your public profile information, address, email address, and tax identification number or Social Security number for compliance, tax, and accounting purposes;
- Creating and disclosing aggregated, anonymized, user statistics and other information to (i) affiliates, agents, business partners, and other third parties; (ii) describe the Services to current and prospective business partners; and (iii) other third parties for lawful purposes;
- Sharing some or all your information with our parent company, subsidiaries, affiliates or other companies under common control with us;
- Fulfilling our legal and regulatory requirements, including obligations under SEC and FINRA rules;

- Complying with applicable law, such as responding to subpoenas or similar legal process, and when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request;
- Assessing or completing a corporate sale, merger, reorganization, sale of assets, dissolution, investment, or similar corporate event where we expect that your personal information will be part of the transferred assets;
- Auditing our internal processes for compliance with legal and contractual requirements or our internal policies;
- Preventing, identifying, investigating, and deterring fraudulent, harmful, unauthorized, unethical, or illegal activity, including cyberattacks and identity theft; and
- As otherwise permitted with your consent.

We will take reasonable measures (*e.g.*, by contract) to require that any party receiving your personal information from us undertakes to: (i) retain and use such information only for the purposes set out in this Privacy Policy; (ii) not disclose your personal information except with your consent, as permitted by applicable law, or as permitted by this Privacy Policy; and (iii) generally protect the privacy of your personal information.

III. YOUR CHOICES

Update Information: If your personal information changes, you may correct, update, or delete it by contacting us. You may also correct, update, or delete certain personal information directly in your Account. We will use commercially reasonable efforts to process such requests in a timely manner. Please be aware that it is not always possible to completely remove or modify information in our databases. We will retain and use your information (or copies thereof) as necessary to comply with our legal and/or regulatory obligations, resolve disputes, and enforce our agreements.

Access and Download Personal Information: You may request a copy of your personal information, including a copy in machine-readable form, by contacting us.

Marketing Communications: You may manage your receipt of marketing and non-transactional communications by clicking on the “unsubscribe” link located at the bottom of any of our marketing emails. Please note that you cannot opt out of receiving transactional emails.

Cookie Management: Most browsers allow you to remove or reject cookies. To do this, follow the instructions in your browser settings. Many browsers accept cookies by default until you change your settings. Please note that if you set your browser to disable cookies or other Tracking Technologies, the Platform and/or the Services may not work properly. For more information about cookies, including how to see what cookies have been set on your browser and how to manage and delete them, visit www.allaboutcookies.org.

You will need to apply these opt-out settings on each device from which you wish to opt-out. We cannot offer any assurances as to whether the companies we work with participate in the opt-out programs described above.

Account Settings: Through your Account settings on the Platform, you can update the information you provided to us, hide portions of your profile from other Users or the general public, and hide your profile from search engines. Please note that your profile page may be viewable by other Users and the public, and any comments or information you submit on public areas of the Platform can be read, collected, or used by other Users.

IV. HOW WE PROTECT YOUR INFORMATION

We take commercially reasonable steps to protect your information from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. However, that no security system is impenetrable. We cannot guarantee the security of our databases, nor can we guarantee that the information you supply will not be intercepted while being transmitted to and from us over the Internet. In particular, email sent to or from the Services may not be secure, and you should therefore take special care in deciding what information you send to us via email.

We retain personal information for as long as you use the Platform or Services, or as necessary to fulfill the purposes for which it was collected, provide our Services, resolve disputes, establish legal defenses, enforce our agreements, and comply with applicable laws. Certain personal information subject to record retention requirements (e.g., under SEC and FINRA rules and regulations) may be retained for at least seven (7) years for legal and compliance purposes. We may retain an archived copy of your records as required by law or for legitimate business purposes.

V. CHILDREN'S PRIVACY

Our Services are available only to individuals aged 18 or older, and we do not knowingly collect personal information from any person under the age of 18. If an individual under the age of 18 has provided us with personal information, a parent or guardian of that child may contact us and request that such information be deleted, and we will endeavor to delete that information from our databases.

VI. EXTERNAL WEBSITES AND THIRD PARTIES

Unless explicitly stated otherwise, our Privacy Policy addresses only our use and disclosure of information we collect from and/or about you in your interactions with the Fundify Portal, the Platform and the Services. If you choose to disclose information to third parties, the use and disclosure restrictions contained in this Privacy Policy will not apply, as we do not control the privacy policies of such third parties, nor are we subject to them.

The Platform and the Services may also contain hyperlinks to other third-party websites or apps ("External Websites"). We have no control over the privacy practices or the content of any of our business partners, advertisers, sponsors, or External Websites to which we provide hyperlinks. As such, we are not responsible for the content or the privacy policies of those External Websites. You should check the applicable third-party privacy policy and terms of use when visiting any External Websites.

VII. DO NOT TRACK

As discussed above, third parties such as advertising networks and analytics providers may collect information about your online activities over time and across different websites when you access or use the Services. Currently, various browsers offer a “Do Not Track” option, but there is no standard for commercial websites. At this time we do not monitor, recognize, or honor any opt-out or do not track mechanisms, including general web browser “Do Not Track” settings and/or signals.

VIII. NOTICES TO CERTAIN RESIDENTS

California Residents: Pursuant to Section 1798.83 of the California Civil Code, residents of California have the right to obtain certain information about the types of personal information that companies with whom they have an established business relationship (and that are not otherwise exempt) have shared with third parties for direct marketing purposes during the preceding calendar year, including the names and addresses of those third parties, and examples of the types of services or products marketed by those third parties. If you wish to submit a request pursuant to Section 1798.83, please contact us via email at legal@fundify.com.

Nevada Residents: We do not sell your personal information as defined under Nevada law. Nonetheless, if you are a resident of Nevada, you have the right to opt-out of the sale of certain personal information to third parties. You can exercise this right by contacting us at legal@fundify.com with the subject line “Nevada Do Not Sell Request” and providing us with your name and the email address associated with your Account.

Non-U.S. Residents: The Platform, the Services and our servers are operated in the United States. Please be aware that your information, including your personal information, may be transferred to, processed, maintained, and used on computers, servers, and systems located outside of your state, province, country, or other governmental jurisdiction where the privacy laws may not be as protective as those in your country of origin. If you are located outside the United States and choose to use the Platform and/or Services, you consent to any transfer and processing of your personal information in accordance with this Privacy Policy, and you do so at your own risk.

IX. UPDATES TO THIS PRIVACY POLICY

This Privacy Policy is effective as of the date stated at the top of this Privacy Policy. We may update this Privacy Policy from time to time and without prior notice to you to reflect changes in our privacy practices. We will indicate at the top of this Privacy Policy when it was most recently updated, and we encourage you to revisit this page periodically to stay aware of any changes. By accessing the Platform or the Services after we change this Privacy Policy, you are deemed to have accepted such changes.

X. HOW TO CONTACT US

If you have any questions or comments about this Privacy Policy, our privacy practices, or if you wish to exercise any of your privacy rights, please email us at legal@fundify.com or write to us at:

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