PRIVACY POLICY
Last Modified: 27 October, 2025

This Privacy Policy (the "**Privacy Policy**") describes the types of information Altius Global, Inc. and any of its subsidiaries or affiliates (collectively, "**Altius**", "**we**", "**us**" or "**our**") collect, use and share about you when you use our platform, visit or obtain services from our website or otherwise contact or interact with us (collectively, "**Services**"). The terms "**you**" and "**your**" refers to you, the user. If you are using the Services on behalf of a business, association or other entity, "you" or "your" will also refer to such business, association or other entity, unless the context clearly dictates otherwise. You agree that you are authorized to consent to these terms onbehalf of such business, association or other entity and we can rely on this. This Privacy Policy also explains how Altius may use and share your Personal Information (as defined in Section 2), as well as the choices available to you.

By using/continuing to use the Services, you acknowledge that you have read and understand and agree to the collection, storage, use and disclosure of your personal information as described in this Privacy Policy and you agree to the Terms of Service which are incorporated by reference. If you do not agree, please do not access or use the Services.

Eligibility to Use the Services

To use the Services you must be, and you represent and warrant that you are, at least the age of majority in your state, province or jurisdiction of residence and competent to agree to these terms. If, however, you are under the age of majority in your state, province or jurisdiction of residence, you represent and warrant that your parent or legal guardian has reviewed this Privacy Policy with you and accepts them on your behalf; and in such case, your parents or legal guardians are responsible for your activities as their minor dependents while using the Services.

Terms of Service

If you choose to visit the Services, your visit and any related dispute, including, over privacy, is subject to this Policy and our Terms of Service, including, but not limited to, limitations on damages and resolution of disputes.

1. HOW WE PROTECT YOUR INFORMATION

We have implemented safeguards reasonably designed to secure your Personal Information. Such safeguards include various technical, physical and administrative security measures designed to reduce the risk of loss, misuse, unauthorized access, disclosure or modification of your information. All information you provide to us is stored on our secure servers behind firewalls.

The safety and security of your information is also dependent on your behavior. If we have given you (or where you have chosen) a password for access to certain parts of the Services, you are responsible for keeping this password confidential. We ask you not to share your password with anyone and keep it safe.

While we have employed security technologies and procedures to assist safeguarding your Personal Information, please be aware that no system or network can be guaranteed to be 100% secure and we cannot ensure or warrant the security of any information you provide to us. Unauthorized entry or use, hardware or software failure and other factors may compromise the security of users' information at any time. Any transmission of Personal Information is at your

own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Services.

2. PERSONAL INFORMATION WE COLLECT

Generally, we collect four (4) types of information about you: (A) information and content you give us directly; (B) information we obtain automatically when you use our Services; (C) demographic information; and (D) information we get about you from other sources. When we talk about "Personal Information" in this Privacy Policy, we are talking about any information collected in accordance with this section 2, that identifies individuals or that may, with reasonable effort, identify individuals. Please see below for more information on each category.

A. Information and Content You Give Us Directly

(i) Personal Identifiers and Contact Information: such as your e-mail address, name, phone number, address, usernames, passwords and any other information you directly provide us on or through the Services (for example when you include your fields of interest, hobbies, expertise and other information in your user profile bio). This includes information you provide when you register or create an account or submit a request for customer service.

(ii) Email Correspondences: such as records and copies of your email messages together with your email address and our responses, if you choose to correspond with us through email.

(iii) Transaction Information: such as specific information about investments and other transactions related to you, including, for example, investment vehicles, investment returns, and any other information that you choose to make available to us through the Service, either directly or indirectly, for example, when you provide us with access to an online data room from which we can extract such information (including, your user name and password for accessing said data room).

(iv) Financial Information: such as information and details about any transactions made in relation to the Services (by us or by service providers working on our behalf). This includes payment information, such as your credit or debit card number and other card information; other account and authentication information; and billing and contact details. We do not collect or store payment card information ourselves; rather we rely on our payment processors to store this information as part of the Services.

(v) Professional Information: including job title and employment information.

(vi) Voluntary Information: information you choose to provide voluntarily when interacting with the Service. This may include, for example, responses to our communications, requests for support, direct contact via email, or information you submit through the Service (such as when using our CRM features).

(vii) Other Information: any additional personal data you choose to share with us through the Service.

If you provide us with personal information about another individual, you are responsible for ensuring that you have the legal authority to do so, including providing any necessary notice and obtaining any required authorization under applicable laws. You must also ensure that the individual is aware their information may be processed in accordance with

this Privacy Policy.

B. Information We Obtain Automatically When You Use Our Services

(i) Activity Information. Details of your visits to our Services, including the types of content you view or engage with; the features you use; the actions you take; the people or accounts you interact with; the time, frequency and duration of your activities; and other information about your use of and actions on the Services.

(ii) Equipment Information. Information such as your device's IP address, browser type, browser version, unique device identifiers and other diagnostic data. When you access the Service by or through a mobile device, we may collect the type of mobile device you use, your mobile device unique ID, the IP address of your mobile device, your mobile operating system, the type of mobile Internet browser you use, unique device identifiers and other diagnostic data.

(iii) Location Information. Information about the location of your device, including GPS location, for purposes of enhancing or facilitating the Services. We may also use information about the location of the device you are using to help us understand how the Services and functionality are being used and to deliver more relevant advertising. If you do not want to share your location, you can disable location sharing in the settings on your device.

(iv) Cookies and Other Technologies. Cookies, clear GIFs, javascript, entity tags, HTML5 local storage, resettable device identifiers or other similar technologies (collectively, the "**Technologies**") may be used by us, as well as third parties that provide the content, advertising or other functionality on the Services to automatically collect information through your use of the Services. Please see Section 9 for more information on the technologies we may use for this automatic data collection.

C. Demographic Information

We may collect demographic, statistical or other aggregate information that is about you, but individually does not identify you. Some of this information may be derived from Personal Information, but it is not Personal Information and cannot be tied back to you. Examples of such aggregate information include gender, age, race, household income and political affiliation.

D. Information We Get About You from Other Sources

We may receive information about you from other sources and add it to our information, including from third-party services and organizations who have the right to provide us with such information. We protect this information according to the practices described in this Privacy Policy, plus any additional restrictions imposed by the source of the data. These sources may include online and offline data providers, from which we obtain demographic, interest-based and online advertising related data; publicly available sources such as open government databases or social networks; and service providers who provide us with information and updates to that information, based on their relationship with you. By gathering additional information about you, we can correct inaccurate information, enhance the security of your transactions and give you product or service recommendations and special offers that are more likely to interest you.

3. HOW WE USE YOUR INFORMATION

We may use the information we collect about you in a variety of ways, to provide and operate our Services, for administrative purposes, to market and advertise our Services and products and any other legitimate commercial purpose we may have, from time to time.

A. We Use Your Personal Information to Provide Our Services

We may use your Personal Information to:

(i) provide the Services and related content to you;
(ii) respond to comments, questions and provide customer service;
(iii) communicate with you about an order, purchase or account;
(iv) inform you about important changes to or other news about, the Services or any related features or content;
(v) identify you or authenticate your identity; and
(vi) fulfill any other purpose for which you provide Personal Information.

B. We Use Your information for Administrative Purposes

We may use your Personal Information to:

(i) operate, maintain, improve, personalize and analyze the Services;
(ii) monitor and analyze trends, usage and activities for marketing or advertising purposes;
(iii) detect, prevent or investigate security breaches, fraud and other unauthorized or illegal activity, including cybersecurity needs such and misuse of our website or service;
(iv) carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection;
(v) maintain appropriate records for internal administrative purposes; and
(vi) allow you to participate in interactive features on the Services.

C. We Use Your Information to Market and Advertise Our Services and Products

We may use your Personal Information to:

(i) send general communications, such as information about features, newsletters, offers, promotions, contests and events;
(ii) share information across Services and devices to provide a more tailored and consistent experience on all Altius products or services you use; and
(iii) develop, test and improve new products or services, including troubleshooting new products and features.

4. HOW WE MAY SHARE OR DISCLOSE YOUR INFORMATION

We may share or disclose aggregated or anonymized information about our users to third parties for a variety of business purposes without any restrictions, including to provide our Services, to protect us or others or in the event of a major business transaction such as a merger, sale or asset transfer. The following circumstances describe in additional detail the ways we may share or disclose any Personal Information about you under this Privacy Policy:

A. We Disclose Your Information to Provide Our Services

(i) Subsidiaries and Affiliates. We may share your Personal Information with ourparent companies, subsidiaries, joint ventures and affiliated companies for purposes of management and analysis, decision-making and other business purposes, consistent with this Privacy Policy.

(ii) Service Providers. We may share your Personal Information with our third-party service providers, contractors and any other similar third parties that help us provide our Services. This may include, among others, service providers that help us with analytics services or support services, such as credit card processing, website hosting, email and postal delivery, location mapping, product and service delivery, and LLM Partners (see in Section 10 below). Some of our web pages may utilize framing techniques to serve content to you from our third-party providers, while preserving the look and feel of the Services. In such cases, please note that the information you provide is being provided to the third party. Service providers are bound by contractual obligations to keep Personal Information confidential and use it only for the purposes for which we disclose it to them.

(iii) Consent or to Fulfill the Purpose that Information was Provided. We may share your Personal Information to fulfill the purpose for which you provide that information, with your consent or for any other purpose disclosed by us when you provide the information.

B. We May Disclose Your Information in the Event of a Merger, Sale or Other Asset Transfer

If we become involved in a merger, acquisition, financing due diligence, divestiture, restructuring, reorganization, bankruptcy, dissolution, sale or transfer of some or all of our assets (whether as a going concern or as part of bankruptcy, liquidation or similar proceeding) or transition of Services to another provider, your Personal Information may be sold or transferred to business entities or people involved in such process.

C. We Disclose Your Information to Protect Us or Others

(i) When Required by Law. We may share your Personal Information to comply with any court order, law or legal process, including to respond to any government or regulatory request.

(ii) To Enforce Our Rights. We may share your Personal Information to enforce or apply this Privacy Policy, our Terms of Service and other agreements, including for billing and collection purposes.

(iii) To Protect Lawful Interests. We may share your personal information if we believe disclosure will help us protect the rights, property or safety of Altius, our users, partners, agents and others. This may include exchanging information with other companies and organizations for fraud protection and spam and malware prevention.

Personal Information that you post on or through the public areas of the Services (e.g., chat rooms, bulletin boards and discussion groups) are generally accessible to and may be collected and used by, others which may result in unsolicited messages or other contact from others. Users of the Services are encouraged to exercise caution when providing personal information about themselves in public or interactive areas.

Please note that where we rely on your consent to process any of your Personal Information, you

have the right to withdraw your consent at any time. In certain jurisdictions, we rely on our legitimate interests to process your Personal Information under the applicable laws, and where we do, you have the right to object. If you have any questions about or need further information concerning the legal basis on which we collect and use your Personal Information, please contact us through the contact details available below.

5. YOUR PRIVACY CHOICES AND RIGHTS

You have certain choices and rights with respect to your privacy. For example, you may be able to opt out of receiving marketing messages from us, make choices regarding cookies andexercise other privacy rights under applicable law.

A. Mechanisms to Control Your Information

(i) Cookies and Other Tracking Technologies. Please see Section 9.C. for information concerning mechanisms to control cookies and other Technologies.

(ii) Communications from Altius. If you do not wish to have your contact information used by Altius to promote our own or third-party products or services, you can opt-out by following the opt-out instructions below . Please note that we may also send you non-promotional communications, however you will not be able to opt-out of these communications (e.g., transactional communications, including emails about your account or purchases; communications regarding our Services; and communications about updates to this Privacy Policy and the Terms of Service).

(iii) "Do Not Track". "Do Not Track" ("**DNT**") is a privacy preference you can set in certain web browsers. When you turn on this preference, it sends a signal or message to the websites you visit indicating that you do not wish to be tracked. Please note that we currently do not respond to or honor DNT signals or similar mechanisms transmitted by web browsers.

The online advertising industry also provides websites from which you may opt out of receiving targeted ads from data partners and other advertising partners that participate in self-regulatory programs. You can access these and learn more about targeted advertising and consumer choice and privacy by visiting the Network Advertising Initiative, the Digital Advertising Alliance, the European Digital Advertising Alliance and the Digital Advertising Alliance of Canada.

B. Accessing and Correcting Your Information

In accordance with applicable law, you may have the right to:

(i) Access Personal Information. You may access personal information about you, including: (1) confirming whether we are processing your personal information; (2) obtaining access to or a copy of your personal information; and (3) receiving an electronic copy of personal information that you have provided to us or asking us to send that information to another company (the "right of data portability").

(ii) Request Correction of Personal Information. You may request correction of your personal information where it is inaccurate, incomplete or improperly possessed.

(iii) Request Deletion of Personal Information. You may request deletion of your personal information held by us about you. Please note: we cannot delete your personal information except by also deleting your account.

(iv) Opt-out. You may request to opt-out of the processing of your personal information for the purpose(s) of: (1) targeted advertising; (2) sale of personal information; or (3) profiling to make decisions that have legal or other significant effects on you by following the instructions below.

If you would like to exercise any of these rights, you may send us an email to request access to, correction of or removal of any personal information that you have provided to us. We will process such requests in accordance with applicable law.

The following are additional Consumer Privacy Rights:

(i) Non-Discrimination. Residents have the right not to receive discriminatory treatment by covered businesses for the exercise of their rights conferred by the applicable privacy law.

(ii) Authorized Agent. Only you or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child. To designate an authorized agent, please contact us as set forth in "Contact Information" below and provide written authorization signed by you and your designated agent.

(iii) Verification. To protect your privacy, we will take the following steps to verify your identity before fulfilling your request. When you make a request, we will ask you to provide sufficient information that allows us to reasonably verify you are theperson about whom we collected personal information or an authorized representative, which may include asking you to answer questions regarding your account and use of our Services.

C. Your Right to Appeal

If you are dissatisfied with the refusal of Altius to take action in accordance with the exercise of your rights in the "Accessing and Correcting Your Information" sectionabove, you may request reconsideration by Altius, by sending a written request forreconsideration to the mailing address found in the "Contact Information" section below. Within sixty (60) days of Altius' receipt of such written request for reconsideration, Altius shall inform you in writing (at the address indicated in your initial written request) of any action taken or not taken in response to your request for reconsideration, includinga written explanation of the reasons for the decision. In addition, if your request for reconsideration is denied, you have the right to appeal/complain to the applicable data protection authority in your state or jurisdiction of residence.

D. How to Opt-Out?

If you wish to opt out of certain data processing activities, such as receiving marketing communications or the sharing of your personal information with third parties for their direct marketing purposes, you can do so by sending us an email at: Hello@altius.capital.

In your email request, please include: (a) your full name; (b) the email address associated with your account; and (c) a clear statement specifying the type of data processing you wish to opt out of (e.g., marketing emails, sharing with third parties, etc.).

We will process your request promptly and confirm once the opt-out has been completed. Please note: (i) for marketing communications, you may still receive transactional or

service-related messages as described in this Privacy Policy; and (ii) for requests related to third-party data sharing, certain legal or contractual obligations may require continued processing of your information, which will be explained if applicable.

If you have further questions about your privacy rights or this process, please contact us at Hello@altius.capital.

6. INTERNATIONAL TRANSFER OF PERSONAL INFORMATION

If you provide Personal Information through the Services, you acknowledge and agree that such Personal Information may be transferred from your current location to the offices and servers of Altius and the other third parties referenced in this Privacy Policy located in the United States or other countries, which may have data protection laws that are different from the laws where you live. We use commercially reasonable efforts to safeguard your information consistent with the requirements of applicable laws.

Our analytics and engagement tools (including, without limitations, Google Analytics 4, Intellimize, Outgrow, and Microsoft Clarity) may involve data transfers to the United States, the United Kingdom, and Ireland. Where data is transferred to jurisdictions that are not subject to an adequacy decision under GDPR, we rely on standard contractual clauses or other appropriate safeguards to ensure adequate data protection.

7. PERSONAL INFORMATION RETENTION PERIOD

We keep your information for the length of time needed to carry out the purposes outlined in this Privacy Policy and to adhere to our internal record-keeping policies, unless a longer period is required or permitted by applicable law. Our record-keeping policies reflect applicable legal, tax, and regulatory requirements.

In any event, we will not retain Personal Information for more than seven (7) years following the termination of the provision of Services to the relevant individual or entity, except where legal, regulatory, or contractual obligations require a longer retention period (for example, recordkeeping, tax, or dispute-resolution purposes).

Once Personal Information is no longer required for the purposes described above, we will delete it or anonymize it in a manner that prevents re-identification. We may retain aggregated or anonymized data that no longer identifies an individual for analytical, statistical, or business purposes indefinitely, as such data is not considered Personal Information under applicable law.

8. STATE PRIVACY RIGHTS

A. ***California Privacy Rights.*** The California Consumer Privacy Act ("**CCPA**") requires covered businesses to provide California residents with some additional information regarding how they collect, use and share your "personal information" (as defined in the CCPA). While Altius is not currently a covered business under the CCPA, we value privacy and strive to be transparent with our customers. As such, we have provided additional details below about the information we collect, how we disclose it and howyou can exercise your privacy rights under the CCPA.

(i) Categories of Personal Information that is Collected, Disclosed and Shared. The CCPA provides California residents with the right to know what categories of

personal information covered businesses have collected about them and whether such businesses have disclosed that personal information for a business purpose (e.g., to a service provider) in the preceding 12 months. California residents can find this information below:

Category of Personal Information Collected	Category of Third Parties Personal Information is Disclosed to for a Business Purpose
Identifiers. A real name, postal address, Internet Protocol address, email address or other similar identifiers.	• Advertising partners • Service providers
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)) A name, address, telephone number, employment, employment history, bank account number, credit card number, debit card number or any other financial information.	• Service providers
Commercial information Records of products or services purchased, obtained or considered or other purchasing or consuming histories or tendencies.	• Advertising partners • Service providers
Internet or other electronic network activity Browsing history, search history, information on a consumer's interaction with an internet website, application or advertisement.	• Advertising partners • Service providers
Inferences drawn from other personal information to create a profile about a consumer Profile reflecting a consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities and aptitudes.	• Advertising partners • Service providers

Category of Personal Information Collected	Category of Third Parties Personal Information is Disclosed to for a Business Purpose
Professional or employment-related information Collect the employment information of Customers, to provide the appropriate level of service	• Advertising partners • Service providers
Geolocation data As described above, we may collect your IP address automatically when you use our Services. We may be able to determine your general location based on your device's IP address.	• Advertising partners • Service providers

We may use any of the categories of information listed above for other business or operational purposes compatible with the context in which the personal information was collected. The categories of sources from which we collect personal information and our business and commercial purposes for using personal information are set forthin "Personal Information We Collect" and "How We Use Your Information" above, respectively.

We may share any of the information listed above with Service providers, which are companies that we engage for business purposes to conduct activities on our behalf. Service providers are restricted from using personal information for any purpose that is not related to our engagement.

(ii) "Sales" of Personal Information under the CCPA. California residents have the right to opt out of the "sale or sharing" of their personal information. Under the relevant California privacy statutes, (1) "sale" is defined broadly and includes the transfer of personal information by a business to a third party for valuable consideration (even if there is no exchange of money) and (2) "sharing" is defined as communicating personal information by a business to a third party for cross-context behavior advertising.

We do not currently "sell" your personal information. In the event we decide to "sell" your personal information, the categories of personal information we have "sold" and the categories of third parties we have "sold" personal information to in the preceding twelve months will be listed below.

Category of Personal Information Sold by Altius	Category of Third Parties Personal Information is Sold to

Identifiers. A real name, postal address, telephone number, unique personal identifier, online identifier, email address or other similar identifiers.	• N/A
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)) A name, address, telephone number.	• N/A
Commercial information Records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	• N/A

(iii) Additional Privacy Rights for California Residents.

1. *Opt-out of "Sales or Sharing"*. California residents may opt-out of the "sale or sharing" of their personal information by contacting us as set forth in "Contact Information" below.

2. *California Shine the Light.* The California "Shine the Light" law permits users who are California residents to request and obtain from us once a year, free of charge, a list of the third parties to whom we have disclosed their personal information (if any) for their direct marketing purposes in the prior calendar year, as well as the type of personal information disclosed to those parties. Ifyou are a California resident and would like to exercise any of your rights underthe law, please contact us as set forth in "*Contact Information*" below. We will process such requests in accordance with applicable laws.

B. ***Nevada Privacy Rights.*** If you are a resident of Nevada, you have the right to opt-out of the sale of certain Personal Information to third parties who intend to sell or license that Personal Information, even if your Personal Information is not currently being sold. If you would like to exercise this right, please contact us via the information found in the "*Contact Information*" section below.

C. ***EU Privacy Rights***. If you are a resident of any member state of the European Union, you may have additional certain rights under the EU 2016/679 Directive General Data Protection Regulation ("GDPR"), pursuant to which we will be considered as "Data Controllers" with respect to our use of Personal Information of residents of the European Union.

(i) Legal Basis. We base our processing of any personal data as "Data Controllers" based on the following lawful grounds:

1. We rely, primarily, on your consent to the terms of this Privacy Policy and the terms set forth under our Terms of Service, as a legal basis for processing any Personal Information related to you or communicating any other promotional material.
2. We may collect and use your Personal Information when it is necessary for one of the legitimate uses set out in Section 3 above, which we believe are not overridden by your fundamental rights.
3. We may process your Personal Information to comply with a legal obligation and to protect our users' vital interests, including disclosing it, in accordance with Section 4 above.
4. If, at any time, you wish to exercise your rights in accordance with the provisions provided by law (including as provided under Section 5 of this Privacy Policy) you may send us an email to via Hello@altius.capital, and request:
   - to access your Personal Information together with information about how, and on what basis, such information is being processed. Should you desire to receive such information in a different format than the one that was provided to you, you can contact us via Hello@altius.capital and we shall use commercially reasonable efforts to accommodate your request, if applicable.
   - to rectify any of the Personal Information being held when such information is inaccurate.
   - to delete or restrict access to your Personal Information in limited circumstances as described under the GDPR. Please note that if we need to delete any Personal Information related to you, as per your request, it can take time until we completely delete residual copies of such data from our servers and backup systems.
   - to withdraw your consent to the processing of your Personal Information. However, please note that exercising this right will not affect the lawfulness of any previous processing activities based on consent that was lawfully obtained before its withdrawal.
   - to obtain and reuse your Personal Information for your own purposes across different services, as part of your right to data portability.

(ii) Please note that you have the right to complain to a Data Protection Authority about our collection and use of your Personal Information. For more information, please contact your local data protection authority in the European Economic Area (EEA).

(iii) If you have any concerns with respect to our methods of processing any Personal Information related to you, or if wish to withdraw your consent, for any reason, kindly let us know by sending an email to Hello@altius.capital.

Altius shall not charge you for requesting to exercise any of the aforementioned rights.

D. Israel Privacy Rules

(i) If you are an Israeli resident, you should note that we collect, use, disclose, and otherwise process Information as described in this Privacy Policy law, in accordance with the Israeli Privacy Protection Law, 1981, and the regulations promulgated thereunder (the "**PPA**").

(ii) Users are under no legal obligation to provide us with any Personal Information, however, if you choose not to provide us the data categories we request, some (or all) of the features and functionality of the Service may not be available to you.

(iii) You are entitled, in accordance with the PPA, to review Personal Information held about you in our databases and to obtain a copy of such information. A request to review information may be submitted by email to Hello@altius.capital.

(iv) If you examine your Personal Information and find that it is inaccurate, incomplete, unclear, or not up to date, you may request that we correct or delete it.

(v) If you have subscribed to receive newsletters or other marketing communications, your details are retained in our direct-mailing database, as defined in the PPA. You may request removal from this database at any time by contacting us as described above.

(vi) We will review every request submitted under this section in accordance with the provisions of the PPA. As part of this process, we may verify that the request was made by the data subject or an authorized representative and may request reasonable information to confirm your identity. Our response will be provided as soon as possible and no later than thirty (30) days from the date of receipt of your request. In complex cases requiring additional review, we may extend this period by up to an additional thirty (30) days, subject to notifying you of said delay.

(vii) If we decide not to comply with your request, in whole or in part, we will provide a written notice explaining the reasons for refusal in accordance with the PPA and applicable regulations.

9. COOKIES AND OTHER TRACKING TECHNOLOGIES

A. ***Description of the Technologies.*** We, as well as third parties that provide the content on our behalf, advertising or other functionalities on the Services, may use Technologies to automatically collect information through your use of the Services. The following describes some of these Technologies we may use for this automatic data collection:

(i) Cookies. A cookie is a small data file stored on the hard drive of your computer either for (a) the duration of your visit on a website ("session cookies") or (b) for a fixed period ("persistent cookies"). Cookies contain information that can later be read by a web server. We may use cookies to provide you with a more personal and interactive experience on the Services.

Cookie Categories We Use

We use the following categories of cookies through our website and Services:

- Necessary cookies – essential for website operation and security (e.g., Cloudflare, Cookiebot, Webflow functional cookies).
- Functional cookies – to enable certain non-essential features (e.g., Outgrow interactive widgets).
- Analytics cookies – to help us understand how our website is used and to improve performance (e.g., Google Analytics 4, Webflow Analytics powered by Intellimize, Microsoft Clarity).
- Marketing cookies – used for advertising and measuring campaign performance. While we do not currently use these cookies, we may enable LinkedIn Insight Tag

and Meta Pixel in the future, and such cookies will only be active with your consent.

We use an automatic bot to manage consent for all cookies and ensures that no non-essential cookies are deployed until you have provided consent.

Where we embed interactive or analytics tools provided by third-party service providers, those providers may place their own cookies or similar technologies. These are generally used to ensure the functionality of the embedded content (for example, to enable forms or collect aggregated usage statistics). We ensure that any such tools comply with applicable data-protection requirements and that cookie consent is obtained and managed through our primary consent management platform.

(ii) JavaScripts. JavaScripts are code snippets embedded in various parts of websites and applications that facilitate a variety of operations including accelerating the refresh speed of certain functionality or monitoring usage of various online components.

(iii) Entity Tags. Entity Tags are HTTP code mechanisms that allow portions of websites to be stored or "cached" within your browser and validates these caches when the website is opened, accelerating website performance since the web server does not need to send a full response if the content has not changed.

(iv) HTML5 Local Storage. HTML5 local storage allows data from websites to be stored or "cached" within your browser to store and retrieve data in HTML5 pages when the website is revisited.

(v) Resettable Device Identifiers. Resettable device identifiers (also known as "advertising identifiers") are similar to cookies and are found on many mobile devices and tablets (for example, the "Identifier for Advertisers" or "IDFA" on Apple iOS devices and the "Google Advertising ID" on Android devices) andcertain streaming media devices. Like cookies, resettable device identifiers are usedto make online advertising more relevant.

B. ***Our Uses of the Technologies.*** We may also use these technologies for security purposes, to facilitate navigation, to display information more effectively and to better serve you with more tailored information, as well as for site administration purposes, e.g., to gather statistical information about the usage of our websites in order to continually improve the design and functionality, to understand how users use our websites and to assist us with resolving questions regarding use of the websites.

C. ***Mechanisms to Control Cookies and Other Technologies.*** You may be able to set your browser to reject cookies and certain other technologies by adjusting the appropriate settings in your browser. Each browser is different, but many common browsers have preferences that may be adjusted to allow you to either accept or reject cookies and certain other technologies before they are set or installed or allow you to remove or reject the use or installation of certain technologies altogether. We recommend that you refer to the "Help" menu in your browser to learn how to modify your browser settings. Please note that you cannot remove Flash cookies simply by changing your browser settings. 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 the Services may become inaccessible or may not function properly.

D. ***Third Party Technologies.*** This Privacy Policy covers the use of cookies by Altius and does not cover the use of tracking technologies by any third parties. The Services may contain links, content, advertising or references to other websites or applications run by third parties, including advertisers, ad networks and servers, content providers and application providers. These third parties may use cookies or other tracking technologies to collect information about you when you interact with their content on the Services, such as member recruitment vendors to using Web beacons and cookies on our registration pages for payment verification. The information they collect may be associated with your Personal Information or they may collect information about your online activities over time and across different websites. Please be aware that we do not control these third parties' tracking technologies or when and how they may be used. Therefore, Altius does not claim nor accept responsibility for any privacy policies,practices or procedures of any such third party. If you have any questions about an ad or other targeted content, you should contact the responsible provider directly.

10. ARTIFICIAL INTELLIGENCE.

The Service may include tools and features that incorporates the use of Artificial Intelligence (AI) modules to enhance the user experience and offer decision-making or computing tools as part of the Service. For example, the Service offers users the opportunity to use AI to view highlighted information summary of their investments' information.

Any content generated by an AI-generated system is intended for general informational purposes only. The AI system uses algorithms, data sources, and machine learning techniques to produce content, which may not always be accurate, consistent, complete, updated, or applicable to specific situations. The content should not be considered as professional or personalized advice. Accordingly, we strongly recommend independently verifying any content generated by such AI-systems and consulting with professionals for specific advice or information. We do not assume any responsibility or liability for the use or interpretation of such AI-generated content. Using such tools made available through the Service constitute your acknowledgement that you have read and understood the risks entailed in using this feature and agreed that any such use is made at your own risk.

In order to enable such generative AI capabilities within our Services, we may share information that you or your provide to us through direct upload, manual input, or third-party integrations with large language model (LLM) partners ("**LLM Partners**"). By using our Services and submitting requests, you agree to have your information submitted to our LLM Partners in order to provide context when generating a response. We will never share any personally identifiable information in its complete form with any other organization, including our LLM Partners without your explicit consent.

PLEASE NOTE, the account manager may decide, at its sole discretion, whether or not to share any personally identifiable information with such AI system and our LLM Partners and allow the use of such information for modules' training or any other purpose. We will not share any personally identifiable information about you with any AI operator without your explicit consent.

11. CHILDREN USING OR ACCESSING THE SERVICES

We are committed to protecting the privacy of children who visit our use our Services. Altius's Services are directed at a general audience and are not targeted to children. If we learn that we

have inadvertently collected or received Personal Information from an individual under the age of 13 in violation of applicable law, we will use reasonable efforts to immediately remove such information, unless we have a legal obligation to keep it. If you are a parent or legal guardian and think your child under the age of thirteen (13) has given us information without your consent, please contact us via the information found in the "*Contact Information*" section below.

12. CHANGES TO OUR PRIVACY POLICY

We reserve the right to update this Privacy Policy from time to time in order to reflect, for example, changes to our practices or for other operational, legal or regulatory reasons. When we do update this Privacy Policy, we will post the updates and changes on our website. We may elect to notify you of material changes by mail, email, posting of modified Privacy Policy or some other similar manner. However, it is your responsibility to check our website regularly for changes to this Privacy Policy. Your continued use of or access to the Services following the posting of any changes to this Privacy Policy constitutes acceptance of those changes.

13. THIRD-PARTY WEBSITES AND APPLICATIONS

Our online Services may offer links to websites or applications that are not run by us but by third parties. These third-party services, websites or applications are not controlled by us and may have privacy policies that differ from our own. We encourage our users to read the privacy policies and terms and conditions of each website and application with which they interact. We do not endorse, screen or approve and are not responsible for the practices of such third parties or the content of their application or website. Providing Personal Information to third-party websites or applications is at your own risk.

14. CONTACT INFORMATION

For more information about our privacy practices, if you have questions or if you would like to make a complaint, please contact us by e-mail at Hello@altius.capital