PRIVACY POLICY

Last updated: July 16, 2026

Introduction

We are Seeds Investor LLC (or “we”, “us”, “Company”, or “Seeds”), a Registered Investment Advisor ("RIA"), located in the State of New York. Seeds provides investment advisory and related services for clients nationally.

We respect your privacy and take it seriously. Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. The purpose of this Privacy Policy (or “Policy”) is to provide you with information on how the Company collects and processes your personal information.

This Policy sets out our current policies and commitment to data protection and privacy. In line with this, we aim to collect and process only data strictly necessary in the context of our relationship with (prospective) customers, (future) partners, users/visitors of our website, in order to provide services and/or information for specific and legitimate purposes.

Please review this Policy carefully. It contains information on how we collect, use, share, and protect the personal information that we obtain.

By using our services, you are consenting to the practices described in this Policy, our Privacy Notice, and our Terms & Conditions.

INFORMATION WE COLLECT FROM YOU

In this Policy, “**personal information**” or “**personal data”** refers to information that identifies you or may identify you (e.g., your name, address, identification number, etc.).
Processing of personal information refers to actions such as collecting, handling, storing, and protecting personal information.

Please review our GLBA Privacy Notice for detailed information on how we process and disclose non-public personal information (“NPI”) we collect from and about you in connection with our Services.

We collect personal information that you voluntarily provide when you request information about our services, subscribe to receive communications, or otherwise interact with our website. The types of personal information we collect may vary depending on the nature of your relationship with us, the specific services you use, and the context in which the information is provided.

Indicatively, the following are examples of categories and types of personal information that may be processed:

- Individual personal information (such as name, date, and place of birth).

- Individual personal contact details (such as email address, phone number, home and work address).
- Identity information (such as passport, nationality, tax ID).
- Financial information (such as income, assets, source of wealth).

In general, you have control over the amount and type of personal information you choose to provide when interacting with our website. We only collect information that is necessary to deliver our services or respond to your requests.

Please do not provide us with any personal information about third parties unless you have obtained their express consent or are otherwise legally authorized to disclose such information, whether under applicable law or a valid contractual obligation. If you do share third-party personal information with us, you are responsible for informing those individuals of the nature and purpose of the disclosure, as well as the terms of this Privacy Policy, including how we may use and protect their information.

We collect personal information by lawful and transparent means, with your knowledge and, where required, your consent. Whenever we collect personal information, we will clearly explain the purposes for which it is being collected and how it will be used. You have the right to decline to provide personal information; however, please note that doing so may limit your ability to access certain features, services, or functionality offered by the Company.

INFORMATION OBTAINED FROM OTHER SOURCES

- **Service Providers:** We may obtain your personal information from third-party providers, including credit bureaus, broker-dealers, and vendors that support services such as Anti-Money Laundering (AML) and Know Your Customer (KYC) compliance
.
- **Government and Public Sources:** Where permitted by law, we may also access personal information from public records and official sources, such as courts, tax authorities, regulatory bodies, government agencies, and law enforcement.

HOW WE USE AND SHARE YOUR INFORMATION

We collect and process personal information only when it is lawful, necessary, and relevant to the services we offer. This includes fulfilling contractual obligations, complying with legal requirements, operating our business, and—where appropriate—communicating with you based on your consent or our legitimate interests.

USE OF PERSONAL INFORMATION

We may use your personal information for the following purposes:

- To onboard you as a Client for our services;
- To fulfill legal or contractual obligations
- To tailor financial guidance
- To improve our operations and offerings
- To communicate with you - This includes responding to your requests, providing service updates, and—where permitted—sending you promotional or informational content. You

may opt out of marketing emails at any time. See how to do that under the section “Your Choices” below.
- To comply with a subpoena, court order, or other legal obligation;
- To enforce our Terms & Conditions or investigate potential violations;
- To protect our rights, users, affiliates, or others in connection with legal claims, fraud prevention, or security concerns.
- With your consent - In cases where we are not relying on a contract or legal obligation, we may request your consent before collecting or using your personal information. Consent may be withdrawn at any time by contacting us.

ARTIFICIAL INTELLIGENCE (AI)

We use approved artificial intelligence (AI) tools to support our internal business operations, such as improving operational efficiency and assisting our personnel in performing administrative and business functions. We do not currently use AI as part of the services we provide to our customers or through any customer-facing features.

Where our approved third-party AI service providers process personal information on our behalf, they do so solely for the purpose of providing the contracted services to us. We contractually prohibit such providers from using personal information processed on our behalf to train or improve their own AI models.

SHARING PERSONAL INFORMATION WITH THIRD PARTIES

We do not sell your personal information. We only share it with trusted parties where necessary for specific purposes:

- **Service Providers -** We may share personal data with third-party vendors that support our operations—such as IT providers, data processors, cloud hosting services, and customer support tools. These vendors are contractually required to protect your data and use it only for authorized purposes.
- **Professional Advisors -** Including auditors, attorneys, and consultants engaged to support business operations, conduct audits, or manage risks and compliance.
- **Regulatory and Legal Authorities -** We may disclose personal information to regulators, tax authorities, law enforcement, and courts when required by law or to respond to official requests.

We limit the information shared to what is necessary for each purpose and take reasonable steps to help support its handling in line with applicable data protection standards.

We do not sell your personal information.

DATA STORAGE

The personal information we collect is stored and processed in the United States of America or in other jurisdictions where Seeds, its subsidiaries, affiliates, or service providers operate. Personal data may be transferred to jurisdictions that apply data protection laws consistent with our commitment to privacy and responsible data handling.

REQUESTING, AMENDING, OR DELETING PERSONAL INFORMATION

If you wish to request a complete copy of all personal information we hold about you, you may submit a request by contacting us using the details provided at the end of this Policy. Upon receipt of your request, we will inform you of the expected timeframe for fulfilling it.

If you wish to update, correct, or delete any personal information you have provided, you may contact us through the contact information at the end of this Policy. Please note that removing or altering certain information may impact the services we can provide to you.

To protect your privacy and security, we will take reasonable steps to verify your identity before granting access or making any changes to your personal information. This verification process helps confirm that your data is only shared or modified by you.

RETENTION PERIOD

Our data retention periods are primarily determined by legal and regulatory obligations that require us to retain certain information for a specific duration. As such, personal information cannot be deleted until these minimum retention periods have passed.

Unless stated otherwise in this Policy, we retain your personal information only for as long as necessary to:

- Provide you with the services you have requested or to fulfill and enforce our contractual obligations;
- Comply with legal requirements, including those set by tax authorities or financial regulators;
- Establish, exercise, or defend legal claims in court, regulatory, or administrative proceedings.

In some cases, we may retain personal information for longer periods where required by law or where justified by legitimate interests - such as managing ongoing legal matters, handling complaints, preventing fraud, or complying with anti-money laundering regulations.

CHILDREN'S PRIVACY

We are committed to protecting the privacy of all individuals, including children. In compliance with the Children's Online Privacy Protection Act (COPPA), we do not knowingly collect, use, or disclose personal information from children under the age of 13 without obtaining verifiable parental consent.

Our services are intended for use by adults and are not directed at children. If you are under the age of 13, please do not provide us with any personal information. If we become aware that we have inadvertently collected personal information from a child under 13, we will take reasonable steps to delete such information from our records promptly.

DATA SECURITY

We take the security of your personal information seriously and have implemented appropriate technical, administrative, and organizational measures to safeguard the data in our care, both during transmission and once it is received. These measures are designed to protect your personal information from accidental or unlawful destruction, loss, alteration, unauthorized disclosure, or access.

Our safeguards include, but are not limited to:

- Encryption of data in transit and at rest;
- Secure access controls and authentication procedures;
- Physical access restrictions to our facilities and systems;
- Routine monitoring and vulnerability assessments;
- Staff training on data privacy and security best practices.

Despite our efforts, please be aware that no method of electronic transmission over the Internet or method of storage is completely secure, and we cannot guarantee absolute security.

If you access our services using user authentication (e.g., login credentials), you are responsible for maintaining the confidentiality and security of your credentials. Do not share your password or login details with anyone, and notify us immediately if you suspect any unauthorized use of your account or a breach of security.

EXTERNAL WEBSITES AND THIRD PARTIES

This Privacy Policy applies solely to the personal information we collect and process through our own systems, services, and website. While we strive to work only with partners, affiliates, and third-party service providers whose privacy practices are consistent with our own standards, we do not control—and are not responsible for—their data handling practices. We encourage you to review the privacy policies of any third parties before sharing your personal information with them.

Our website may contain links to third-party websites or services that are not operated or controlled by us. Please note that we do not have control over the content, security, or privacy practices of these external sites, and we disclaim any responsibility or liability for how they may collect, use, or disclose your information. Your interaction with such third-party sites is governed by their respective privacy policies and terms of use.

YOUR CHOICES

Below are some mechanisms that provide you with control over the information we collect:

COOKIES MANAGEMENT

Cookies are small data files stored on your device by your web browser when you visit a website. They help recognize your device and remember information about your visit. We use cookies to support key functions of our website and services, such as authenticating users, delivering content that matches your interests, analyzing how you interact with our features, and assessing the effectiveness of our marketing efforts.

We may use both session cookies, which are temporary and deleted when you close your browser, and persistent cookies, which remain on your device until manually deleted or expired.

Most web browsers allow you to manage your cookie preferences, including blocking or deleting cookies. You can typically do this by adjusting your browser settings—please refer to your browser's help section for specific instructions. Keep in mind that many browsers accept cookies by default unless you actively change your settings.

Disabling cookies or similar tracking technologies may affect how our website or services function, and some features may not work as intended.

For more information about cookies, including how to view, manage, or delete them, you can visit www.allaboutcookies.org. Please note that any changes you make will need to be applied individually on each device and browser you use.

Additionally, we cannot guarantee that third-party companies we work with participate in industry-wide opt-out tools or settings mentioned above.

MARKETING COMMUNICATIONS

You may choose to opt out of receiving promotional emails, marketing offers, or other non-essential communications from us at any time. To do so, simply click the "unsubscribe" link provided at the bottom of any such email.

Please note that even if you opt out of receiving marketing communications, we may still send you important service-related messages that are necessary for the administration of your account or the fulfillment of transactions. These may include communications related to account registration, updates to your user information, password changes, or other essential service notifications.

Please allow up to 15 business days for your opt-out request to be fully processed. During this time, you may continue to receive communications that were already in production or scheduled before your request was submitted.

DO NOT TRACK

Do Not Track (DNT) is a privacy setting that users can enable in certain web browsers. Currently, we do not recognize or respond to DNT signals.

CHANGES TO THIS NOTICE

We may update this Privacy Policy from time to time to reflect changes in our practices, legal or regulatory requirements, or to keep it accurate and relevant. When we make material changes, we will post the updated Policy on our website at https://www.useseeds.com/ and revise the "Last Updated" date at the top of the Policy. Where appropriate, we may also notify you through other means, such as email or a prominent notice on our website.

Your continued use of our services after any changes to this Privacy Policy constitutes your acknowledgment and acceptance of the updated terms.

We encourage you to review this Policy periodically to stay informed about how we protect your personal information.

CONTACTING US

If you have any questions or comments about this Privacy Policy and /or our privacy practices, please email us at support@useseeds.com.