Valtrion Capital Management Privacy Policy
Last Updated: January 2026

1. Acceptance of Privacy Policy

Welcome to Valtrion Capital Management LLC ("**Valtrion Capital Management**" "**we**" or "**us**") and our Privacy Policy ("**Privacy Policy**"). This Privacy Policy is important and affects your legal rights, so please read carefully.

By accessing or using **valtrion.com** and various related websites and services (collectively, the "**Valtrion Capital Management Services**"), you agree to be bound by this Privacy Policy and all of the terms incorporated herein by reference. By using the Valtrion Capital Management Services and/or submitting or collecting any personal data via the Valtrion Capital Management Services, you accept and expressly consent and agree to our practices surrounding the collection, use, and sharing of your personal information in accordance with this Privacy Policy. If you do not consent and agree with the terms of this Privacy Policy, you cannot, and we do not authorize you to, access, browse, or use the Valtrion Capital Management Services.

Our processing of personal information, such as your name, address, e-mail address, or telephone number, shall be undertaken consistent with the requirements of applicable privacy laws, including, but not limited to, the California Consumer Privacy Act ("CCPA"), the California Privacy Rights Act ("CPRA"), the General Data Protection Regulation ("GDPR"), the UK General Data Protection Regulation ("UK GDPR"), and the Canadian Personal Information Protection and Electronic Documents Act ("PIPEDA").

2. Information We Collect

2.1 Personal Information We Collect Directly from You

We receive personal information directly from you when you voluntarily provide us with such personal information, including, without limitation, the following:

(1) personal information (such as your e-mail address and phone number);
(2) company information (such as your company's address); and
(3) other identifying information that you voluntarily choose to provide to us, including without limitation unique identifiers such as passwords, and personal information in messages you send to us.

We may also collect additional information, which may be personal information, as otherwise described to you at the point of collection or pursuant to your consent.

2.2 Information We Automatically Collect When You Use Our Site

In order to access and use certain areas or features of the Valtrion Capital Management Services, you consent to our collection and use of certain information about your use of the Valtrion Capital Management Services through the use of tracking technologies or by other passive means. Your consent to our access and use of this "passively collected" information includes, but is not limited to, the domain name of the website that allowed you to navigate to the Valtrion Capital Management Services, search engines used, the internet protocol (IP) address used, the length of time spent on the Valtrion Capital Management Services, the pages you looked at on the Valtrion Capital Management Services, other webpages you visited before and after visiting the Valtrion Capital Management Services, the type of device and/or internet browser you have, the frequency of your visits to the Valtrion Capital Management Services, and other relevant statistics (collectively "Traffic Data"):

3. How We Collect Information

We collect information (including personal information and Traffic Data) when you use and interact with the Valtrion Capital Management Services, and in some cases from third party sources. Such means of collection include:

- When you use the Valtrion Capital Management Services' interactive tools and services;
- When you voluntarily provide information in free-form text boxes through the Valtrion Capital Management Services or through responses to surveys, questionnaires and the like;
- If you use a location-enabled browser, we may receive information about your location and mobile device, as applicable;
- Through Cookies, web beacons, analytics services and other tracking technology (collectively, "Tracking Tools**"**), as described below; and
- When you use the "Contact Us" function on the Valtrion Capital Management Services, send us an email or otherwise contact us.

4. Tracking Tools, Behavioral Advertising, and Opt Out Options

4.1. Tracking Tools

We may use tools outlined below in order to provide the Valtrion Capital Management Services, advertise to, and better understand users.

- **Cookies:** "Cookies" are small computer files transferred to your computing device that contain information such as user ID, user preferences, lists of pages visited and activities conducted while using the Valtrion Capital Management Services. We use Cookies to improve or tailor the Valtrion Capital Management Services, customize advertisements by tracking navigation habits, measuring performance, and storing authentication status so re-entering credentials is not required, customize user experiences with the Valtrion Capital Management Services, and for analytics and fraud prevention. For more information on Cookies, including how to control your Cookie settings and preferences, visit http://www.allaboutCookies.org. You can manage Cookies in your web browser (for example, Edge, Explorer, Chrome, Safari, etc.) settings, and you always have the choice to change these settings by accepting, rejecting, or deleting Cookies. If you choose to change your settings, you may find that certain functions and features of the Valtrion Capital Management Services will not work as intended. Cookie settings are slightly different depending on the browser used, so to manage Cookies, you should refer to the program documentation and the relevant settings within your particular browser. The follow details the types of Cookies we use and why we use them:

    - Absolutely necessary Cookies. These Cookies are essential to enable you to move around a website and use its features. Without these Cookies, services you have asked for, like adding items to an online order, cannot be provided.

    - Performance Cookies. These Cookies collect information about how you use our Valtrion Capital Management Services. Information collected includes, for example, the Internet browsers and operating systems used, the domain name of the website previously visited, the number of visits, average duration of visit, and pages viewed. These Cookies do not collect information that personally identifies you and only collect aggregated and anonymous information. Performance Cookies are used to improve the user-friendliness of a website and enhance your experience.

- Functionality Cookies. These Cookies allow the Valtrion Capital Management Services to remember choices you make (such as your username or ID, language preference, or the area or region you are in) and provide enhanced, more personal features. These Cookies can also be used to remember changes you have made to text size, fonts, and other customizable parts of web pages. They may also be used to provide services you have asked for, such as watching a video or commenting on a blog. The information these Cookies collect may be anonymized, and they cannot track your browsing activity on other websites.

- **Web Beacons:** "Web Beacons" (a.k.a. clear GIFs or pixel tags) are tiny graphic image files embedded in a web page or email that may be used to collect information about the use of our Valtrion Capital Management Services, the websites of selected advertisers and the emails, special promotions or newsletters that we send. The information collected by Web Beacons allows us to analyze how many people are using the Valtrion Capital Management Services, using selected publishers' websites or opening emails, and for what purpose, and also allows us to enhance our interest-based advertising (discussed further below).

- **Web Service Analytics:** We may use third-party analytics services in connection with the Valtrion Capital Management Services, including, for example, to register mouse clicks, mouse movements, scrolling activity and text typed into the Valtrion Capital Management Services. We use the information collected from these services to help make the Valtrion Capital Management Services easier to use and as otherwise set forth in Section 5 (How We Use Your Information). These analytics services generally do not collect personal information unless you voluntarily provide it and generally do not track your browsing habits across web services that do not use their services.

- **Mobile Device Identifiers:** As with other Tracking Tools, mobile device identifiers help Valtrion Capital Management learn more about our users' demographics and internet behaviors in order to personalize and improve the Site. Mobile device identifiers are data stored on mobile devices that may track mobile device and data and activities occurring on and through it, as well as the applications installed on it. Mobile device identifiers enable collection of personal information (such as media access control, address and location) and Traffic Data.

4.2. Behavioral Advertising

We may use a type of advertising commonly known as interest-based or online behavioral advertising. This means that some of our partners use Tracking Tools to collect information about a user's online activities to display Valtrion Capital Management ads to the user based on the user's interests ("Behavioral Advertising"). Such partners may include third-party service providers, advertisers, advertising networks or platforms, traffic measurement service providers, marketing analytics service providers, and other third party service providers (collectively, "Advertising Service Providers"). Other Tracking Tools used by our partners may collect information when you use the Site, such as IP address, mobile device ID, operating system, browser, web page interactions, geographic location and demographic information, such as gender and age range. These Tracking Tools help Valtrion Capital Management learn more about our users' demographics and internet behaviors.

4.3. Options for Opting out of Cookies and Mobile Device Identifiers

If we process Cookies based on your consent (as indicated at the time of collection of such data), you have the right to withdraw your consent at any point in time by contacting us at info@valtrioncapital.com. Please note, that if you exercise this right, you may have to then provide your consent on a case-by-case basis for

the use by us or disclosure of certain Cookies, if such use or disclosure is necessary to enable you to utilize some or all of our services.

Some web browsers allow you to reject Cookies or to alert you when a Cookie is placed on your computer, tablet or mobile device. You may be able to reject mobile device identifiers by activating the appropriate setting on your mobile device. Although you are not required to accept Valtrion Capital Management's Cookies or mobile device identifiers, if you block or reject them, you may not have access to all features available through the Valtrion Capital Management Services.

- You may opt out of receiving certain Cookies and certain trackers by visiting the Network Advertising Initiative (NAI) opt out page or the Digital Advertising Alliance (DAA) opt out page, or by installing the DAA's AppChoice app (for iOS; for Android) on your mobile computing device. When you use these opt-out features, an "opt-out" Cookie will be placed on your computer, tablet or mobile computing device indicating that you do not want to receive interest-based advertising from NAI or DAA member companies. If you delete Cookies on your computer, tablet or mobile computing device, you may need to opt out again. For information about how to opt out of interest-based advertising on mobile devices, please visit http://www.applicationprivacy.org/expressing-your-behavioral-advertising-choices-on-a-mobile-device. You will need to opt out of each browser and device for which you desire to apply these opt-out features.

- Even after opting out of Behavioral Advertising, you may still see Valtrion Capital Management advertisements that are not interest-based (i.e., not targeted toward you). Also, opting out does not mean that Valtrion Capital Management is no longer using Tracking Tools — Valtrion Capital Management still may collect information about your use of the Valtrion Capital Management Services even after you have opted out of Behavioral Advertising and may still serve advertisements to you via the Valtrion Capital Management Services based on information it collects via the Valtrion Capital Management Services.

This Privacy Policy does not cover the use of Cookies and other Tracking Tools by any third parties, and we aren't responsible for their privacy policies and practices. Please be aware that some Cookies placed by third parties can continue to track your activities online even after you have left the Valtrion Capital Management Services.

4.4. How Valtrion Capital Management Responds to Browser "Do Not Track" (DNT) and Universal Opt-Out Preference Signals

Some web browsers (including Safari, Internet Explorer, Firefox and Chrome) incorporate a "Do Not Track" (DNT) or similar feature that signals to web services that a visitor does not want to have their online activity and behavior tracked. If a web service operator elects to respond to a particular DNT signal, the web service operator may refrain from collecting certain personal information about the browser's user. Not all browsers offer a DNT option and there is currently no industry consensus as to what constitutes a DNT signal. For these reasons, many web service operators, including Valtrion Capital Management, do not proactively respond to DNT signals. For more information about DNT signals, visit http://allaboutdnt.com.

New standards are being developed for a Universal Opt-Out Mechanism, such as the Global Privacy Control (GPC), which allow users with GPC-enabled browsers and devices to send a signal that will communicate the user's request to opt-out of sales of their personal information and to opt-out of certain sharing of their personal information. The CPRA and other laws allow for the acceptance of Opt-Out Preference Signals

such as the GPC, as an option for users to transmit an Opt-Out of selling/sharing personal information. If we detect and recognize such a signal from your device or browser, we will honor it.

5. How We Use Your Information

We do not engage in automated decision making. We may use information (including information that has been de-identified and/or aggregated) to better understand who uses the Valtrion Capital Management Services and how we can deliver a better user experience. We use information, including personal information, to provide the Valtrion Capital Management Services and to help improve the Valtrion Capital Management Services, to develop new services, and to advertise (for example, to display Valtrion Capital Management ads on other web services). Specifically, such use may include:

- Providing you with the products, services and information you request;
- Corresponding with you;
- Providing, maintaining, administering or expanding the Valtrion Capital Management Services, performing business analyses, or for other internal purposes to support, improve or enhance our business, the Valtrion Capital Management Services, and other products and services we offer;
- Sending you information about Valtrion Capital Management or our products or the Valtrion Capital Management Services;
- Combining information received from third parties with information that we have from or about you and using the combined information for any of the purposes described in this Privacy Policy;
- Showing you advertisements, including interest-based or online behavioral advertising;
- Using statistical information that we collect in any way permitted by law, including from third parties in connection with their commercial and marketing efforts;
- Fulfilling our legally required obligations, such as preventing, detecting and investigating security incidents and potentially illegal or prohibited activities;
- Protecting against or deterring fraudulent, illegal, or harmful actions; and
- Enforcing our Privacy Policy and other agreements.

We may disclose, sell, rent, loan, transfer, and/or trade your personal information to unaffiliated third parties for any of the purposes specified in this Privacy Policy, including for such third parties to use your personal information for their own marketing purposes, to send marketing solicitations to offer products or services, and to use the personal information for data validation, data enhancement, data information authentication/verification, and/or data suppression services. For example, we may sell personal information to third party advertising service providers to help facilitate their data marketplace offerings with data buyers, and to third party data analytics service providers to help facilitate their data matching offerings with data authentication customers.

By providing your e-mail and/or phone number and checking a box, clicking the “complete” button, or some other affirmative act, you are consenting to receive e-mails and/or calls and text messages, including live, prerecorded, and/or automated calls and text messages and alerts, to that phone number. After signing up, you will receive a confirmation e-mail or text message from Valtrion Capital Management on your mobile number. This agreement is not entered into as a term or requirement of any purchase or promotion. Normal message and data rates may apply. Message frequency may vary. Neither we nor the participating carriers guarantee that messages will be delivered. We may discontinue these programs at any time without notice.

6. How We Share Your Information

In certain circumstances, including in order to perform the Valtrion Capital Management Services, we may share certain information that we collect from you, as described in this section:

- We may sell your personal information to third parties. We may share your personal information with our partners to customize or display our advertising.
- We may share your personal information and/or Traffic Data with our partners who perform operational services (such as hosting, billing, fulfillment, data storage, security, insurance verification, web service analytics, or ad serving) and/or who make certain services, features or functionality available to our users.
- To determine if users have interacted with content across multiple devices and to match such devices, we work with partners who analyze device activity data and/or rely on your information (including demographic, geographic and interest-based data). To supplement this analysis, we also provide de-identified data to these partners. Based on this data, we may then display targeted advertisements across devices that we believe are associated or use this data to further analyze usage of the Valtrion Capital Management Services across devices.
- We may transfer your personal information to another company in connection with a proposed merger, sale, acquisition or other change of ownership or control by or of Valtrion Capital Management (whether in whole or in part). Should one of these events occur, we will make reasonable efforts to notify you before your information becomes subject to different privacy and security policies and practices.
- We also may need to disclose your personal information or any other information we collect about you if we determine in good faith that such disclosure is needed to: (1) comply with or fulfill our obligations under applicable law, regulation, court order or other legal process; (2) protect the rights, property or safety of you, Valtrion Capital Management or another party; (3) enforce this Privacy Policy or other agreements with you; or (4) respond to claims that any posting or other content violates third-party rights.

7. <u>Collection and Use of Sensitive Information</u>

We have collected the following categories of personal information from consumers within the last twelve months:

- Government identifiers;
- Complete account credentials;
- Racial or ethnic origin;
- Mail, email, or text message contents,
- Health, sex life, or sexual orientation.

We do not use or disclose sensitive personal information for purposes other than those specified in the CCPA/CPRA.

8. Storage and Security of Information

Please note that any information you send to us electronically, while using the Valtrion Capital Management Services or otherwise interacting with us, may not be secure when it is transmitted to us. We recommend that you do not use unsecure channels to communicate sensitive or confidential information to us. Please be aware though that, despite our best efforts, no security measures are perfect or impenetrable, and we cannot guarantee "perfect security." Any information you send us through any means is transmitted at your own risk.

9. Your Choices

9.1 Information You Provide

You can always choose whether or not to provide personal information through the Valtrion Capital Management Services. However, if you choose not to disclose certain personal information, you may not be able to register as a user of the Valtrion Capital Management Services, which may limit your access to certain portions of the Valtrion Capital Management Services. We will not discriminate against you for exercising any of your rights, including otherwise denying you goods or services, providing you with a different level or quality of services, or charging you different prices or rates for services.

9.2 California Privacy Rights

In the preceding 12 months, we collected and disclosed for a business purpose the following categories of personal information about California consumers:

Category	Examples	Collected?	Categories of Recipients
Identifiers	Name, address, e-mail address, IP address	Yes	Organizations providing services to Valtrion Capital Management
Personal information categories listed in the California Customer Records statute	Name, professional-related information; and employment-related information	Yes	Organizations providing services to Valtrion Capital Management
Protected classification characteristics under California or federal law	Name, age, citizenship, nationality, ancestry, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, proof of eligibility to work	Yes	Organizations providing services to Valtrion Capital Management
Internet or other similar network activity	Browsing history, search history, information on a consumer's interaction with the Valtrion Capital Management Services	Yes	Organizations providing services to Valtrion Capital Management
Geolocation data	Location and movement data	Yes	Organizations providing services to Valtrion Capital Management

Professional or employment-related information	Proof of eligibility to work, resumé, other professional-related information and employment-related information	Yes	Organizations providing services to Valtrion Capital Management
Biometric information	None	No	n/a
Education Information	None	Yes	Organizations providing services to Valtrion Capital Management
Inferences from the foregoing	None	Yes	Organizations providing services to Valtrion Capital Management

Purposes for Collection, Use, and Sharing. We may sell, use and disclose the personal information we collect for our commercial purposes, as further described in this Privacy Policy, including for our business purposes with our partners and service providers as follows:

- Auditing related to our interactions with you;
- Legal compliance;
- Advertising and marketing;
- To provide content;
- To provide goods or services that have been purchased by you, for you, or on your behalf;
- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and exercising our related rights;
- Debugging;
- Performing services (for us or our service provider);
- Internal research for technological improvement;
- Internal operations;
- Activities to maintain and improve our services; and
- Other one-time or short-term uses.

Sales of Personal Information. In the preceding twelve (12) months, we have sold the following categories of personal information:

- Financial profiles
- Race
- Age
- Occupation
- Personal interests

We sell your personal information to consumer retail and financial institutions solely for the purposes of advertising and offering goods and services that may be of interest to you.

Your Rights. Where applicable, if you are a California resident you may have the following rights under the CCPA in relation to personal information we have collected about you, to the extent required by the CCPA and subject to verification and any applicable exceptions:

Right to Know/Access: You have the right to request that we disclose certain information to you about our collection and use of certain personal information about you as described below:

- The specific pieces of personal information collected;
- The categories of personal information collected;
- The categories of sources from whom the personal information is collected;
- The purpose for collecting the personal information; and
- The categories of third parties with whom we have shared the personal information.

Right to Delete: You have the right to request that we delete your personal information.

Freedom from Discrimination: You have the right to be free from unlawful discrimination for exercising any of the rights above.

Right to Correct: You have the right to request that we correct inaccurate personal information regarding the information you provide us.

Right to Restrict the Use of Sensitive Personal Information: You have the right to restrict the use of your sensitive personal information.

Right to Access Information on Automated Decision-Making: You have the right to access information collected through automated decision-making. Additionally, you can opt-out of our use of automated decision-making related to your personal information.

Opt Out of Sale: You have the right to opt out of sale of your personal information to a third party. Please note that this does not stop us from distributing this information within our organization across business units. Additionally, your right to opt out does not stop all transfers to third parties as we can continue to provide your personal information to our service providers pursuant to a written contract that meets requirements within the CCPA. Furthermore, we can continue to provide data that does not meet the definition of personal information. This right to opt out applies to all California consumers ages 16 or older and may be exercised at any time. We will honor all such requests unless you subsequently decide to opt in to the sale of your personal information. We will honor your request for twelve (12) months before we ask you to opt in to the sale of your personal information.

The sale of personal information does not include if you direct us to interact with a third party, any third party alerts that you have opted out of, the sharing of information is necessary to perform a business purpose and meets the other conditions specified, or the information is transferred as part of an asset in a merger, acquisition, bankruptcy or other change of control event.

Requests: To make a request in relation to the above rights, please contact us using the information in Section 13 below. To fulfil your request, we will need to verify your identity.

Only you, or someone legally authorized to act on your behalf, may make a request related to personal information collected about you. To designate an authorized agent, the authorized agent must provide sufficient information that allows us to reasonably verify that they have been authorized by you to act on their behalf.

9.3 Canada, European Union and United Kingdom Privacy Rights

If our processing of your personal information is subject to the European Union General Data Protection

Regulation, the UK General Data Protection Regulation, and/or the Canadian Personal Information Protection and Electronic Documents Act, and unless subject to an exemption, you may have the following rights with respect to your personal data as applicable:

- The right to request a copy of your personal data which we hold about you and where possible, to transmit that data directly to another data controller;
- The right to request that we correct any personal data about you;
- The right to request your personal data be erased where it is no longer necessary for us to retain such data;
- The right to withdraw your consent at any time to the processing of personal data to which you provided consent for processing;
- The right to request that we provide you with a copy of your personal data;
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction be placed on further processing;
- The right to object to the processing of personal data (where applicable); and
- The right to lodge a complaint with a data supervisory authority.

Please note that we will need to verify your identity before we are able to process any of the requests described in this Section 8, and in our discretion, may deny your request if we are unable to verify your identity. As a part of this process, government or other identification may be required.

If you are a resident of the European Economic Area ("EEA"), when we process your personal data, we will only do so in the following situations:

- We need to use your personal data to perform our responsibilities under our agreement with you;
- We have a legitimate interest in processing your personal data. For example, we may process your personal data to send you marketing communications, to communicate with you about changes to the Valtrion Capital Management Services, and to provide, secure, and improve the Valtrion Capital Management Services.
- We have your consent to do so.

If your personal data is subject to the GDPR or UK GDPR, we will transfer personal data from the EEA to a location outside the EEA only when there has been a documented adequacy determination, or where we have confirmed adequate privacy protections. If we transfer personal data to a third party acting as our agent, we will also obligate the third party to have adequate privacy protections in place.

If your personal data is subject to PIPEDA, we will transfer personal data from Canada to locations outside of Canada only where we have confirmed adequate privacy protections. If we transfer personal data to a third party acting as our agent, we will also obligate the third party to have adequate privacy protections in place.

10. How Long We Retain Your Information

We retain personal information about you for as long as necessary to provide you the Valtrion Capital Management Services. In some cases, we retain personal information for longer, if doing so is necessary to comply with our legal obligations, resolve disputes or collect fees owed, prevent fraud, enforce this Privacy Policy, or as otherwise permitted or required by applicable law, rule or regulation. Afterwards, we retain some information in a de-identified and/or aggregated form but not in a way that would identify you personally.

11. Information Provided on Behalf of Children and Others

The Valtrion Capital Management Services is not intended for use by children and individuals under the age of 18 are prohibited from using the Valtrion Capital Management Services. Valtrion Capital Management does not knowingly collect any information from children, nor is the Valtrion Capital Management Services directed to children. If you are under 18, please do not attempt to register for the Valtrion Capital Management Services or send any personal information about yourself to us. By accessing, using and/or submitting information to or through the Valtrion Capital Management Services, you represent that you are not younger than age 18. If you are a parent or legal guardian of a minor child, you may, in compliance with this Privacy Policy, use the Valtrion Capital Management Services on behalf of such minor child. Any information that you provide us while using the Valtrion Capital Management Services on behalf of your minor child will be treated as personal information as otherwise provided herein. If you use the Valtrion Capital Management Services on behalf of another person, regardless of age, you represent and warrant that you have authority to do so.

12. Third Party Web Services

The Site contains links to or embedded content from third party web services. A link to or embedded content from a non-Valtrion Capital Management web service does not mean that we endorse that web service, the quality or accuracy of information presented on the non-Valtrion Capital Management web service or the persons or entities associated with the non-Valtrion Capital Management web service. If you decide to visit a third party web service, you are subject to the privacy policy of the third party web service as applicable and we are not responsible for the policies and practices of the third party web service. We encourage you to ask questions before you disclose your information to others.

13. Updates and Changes to Privacy Policy

The effective date of this Privacy Policy is set forth at the top of this webpage. We will notify you of any material change by posting notice on this webpage. Your continued use of the Valtrion Capital Management Services after the effective date constitutes your acceptance of the amended Privacy Policy. We encourage you to periodically review this page for the latest information on our privacy practices. Any amended Privacy Policy supersedes all previous versions. IF YOU DO NOT AGREE TO FUTURE CHANGES TO THIS PRIVACY POLICY, YOU MUST STOP USING THE Valtrion Capital Management SERVICES AFTER THE EFFECTIVE DATE OF SUCH CHANGES.

14. Contact Us

The data controller for the purposes of GDPR, UK GDPR, PIPEDA or other data protection laws is Valtrion Capital Management.

If you have any comments, concerns or questions about this Privacy Policy, please contact us at info@valtrioncapital.com or at:

Valtrion Capital Management LLC
701 Cool Springs Blvd Ste 340
Franklin, TN 37067