

## **Overview**

Legacy Investing and its affiliates and subsidiaries (Legacy Data Centers) respect your concerns about privacy. This Privacy Notice describes the types of personal information we collect, how we use the information, with whom we may share it and the choices available to you regarding our use of the information. We also describe measures we take to protect the security of the information and how you can contact us about privacy practices.

This Privacy Policy Notice applies to all products and services offered by Legacy Investing, Legacy Investing Data Centers and sites that automatically are redirected to our websites (“sites”), except where a product or service has a separate privacy statement that does not incorporate this Privacy Notice. Legacy Investing is the entity responsible for the processing of personal information described in the Privacy Notice.

By using this Site, you agree that your use of the Site is governed by this Privacy Policy and our Terms of Service. From time to time, we may update this Privacy Policy. We encourage you to periodically check this Site for updates. Your continued use of the Site affirms your agreement to any changes we make to this Privacy Policy. Please see the “How to Contact Us” section below for further information.

## **Information Collected and How it is Collected**

**Voluntary Information:** We may collect personal information you voluntarily provide to us, including your name, e-mail address, postal address, phone number, mobile number and geographic location. You may provide this information when you request information, register, make a purchase, or for other purposes. We may also collect demographic information such as gender, date of birth, occupation, employer name and zip code. In limited circumstances, we may collect payment information such as credit card number where needed to complete a requested service or transaction. By requesting information to your mobile phone, we may obtain the following information from you in connection with our SMS service: your cell phone number, your carrier’s name, and the date, time and content of your messages, as well as other information that you provide. We will use such information in accordance with this Privacy Policy.

**Automatically Generated Information:** Legacy Investing and our third party service providers may also collect non-personally identifiable information that is generated automatically while you are visiting the Site, other websites, mobile websites and/or mobile applications or elsewhere on the Internet to provide content and advertisements about goods and services of interest to you across those various devices. This data

includes, but is not limited to, information such as IP address, web pages visited before and after visiting the Site, date and time, domain type, type of mobile device you use, your device's unique ID, web pages you view and links you click on within the Site and interactions with an advertisement delivered by us or a third party advertising technology vendor. This type of information may be collected using different types of technologies, such as cookies and pixels. An IP address, for example, is a unique identifier that certain electronic devices use to identify and communicate with each other on the Internet. When you visit our Site, we may view the IP address of the device you use to connect to the Internet. We use this information to determine the general physical location of the device and understand from what regions of the world our Site visitors come. We also may use your non-personally identifiable

All Site users remain anonymous unless they choose to give us their personal information. You may elect not to allow us to collect and use this non-personally identifiable data as part of our Service by following the Opt Out procedures described below.

### **Cookies and Other Technologies**

Overview: We may use cookies and other technologies to obtain certain types of information across various devices when your web browser accesses the Site, other websites, mobile websites, advertisements, mobile applications or visits a web site in our network. "Cookies" are small pieces of information that are stored by your browser. In some cases, we may also use another company to operate web servers or process credit card purchases for our Site. The Site may use cookies and other technology to speed navigation and keep track of items and to gather anonymous traffic data that we may use to enhance the Site, our Services, marketing, and other internal purposes.

Remember me: If you select "remember me" on your computer when logging on to the Site, Legacy Investing will set a persistent cookie to retrieve your username and password when you return to the site so that you do not have to enter it more than once. It also allows us to send confirmations, receipts, updates, alerts and support and administrative messages and otherwise facilitate your use of and our administration and operation of the Site. The persistent cookie also enables Legacy Investing to track and target the interests of users to enhance the experience on the Site. The persistent cookie is removed when you uncheck the "remember me" check box.

Third Party Analytics: We may use third-party analytics service on our Sites, such as Google Analytics. The information we obtain through the Sites may be disclosed to or collected directly by these services. You can opt out of Google Analytics without affecting

how you visit our site. To learn more about Google Analytics, please visit this Google page <http://www.google.com/intl/en/policies/privacy/>.

**Disabling Cookies:** The “Help” portion of the toolbar on most browsers will tell you how to prevent your browser from accepting cookies, how to have the browser notify you when you receive cookies, and how to disable cookies altogether. Note that if you reject or block cookies, it may affect your ability to enjoy the full functionality and experience of our Site.

**Web Beacons:** Pages of our Site and our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit Legacy Investing Data Centers, for example, to count users who have visited those pages or opened an e-mail and for other related web site statistics (for example, recording the popularity of certain web site content and verifying system and server integrity).

### **Opt out**

We offer you certain choices in connection with the personal information we obtain. You can tell us at any time not to send you marketing communications by email by clicking on the unsubscribe link in the marketing emails you receive from us or by sending an “opt out” request to the address indicated on the email. You also may ask us not to contact you in connection with any new product, service, update, news, or event by contacting us by email or as described in the “How to Contact Us” section below to exercise these rights. You also have the right to file a complaint with the data protection supervisory authority in your country if you are not satisfied with our response.

### **Types of Information Collected**

#### **Identifiers (e.g., name, e-mail, postal address, and phone number)**

#### **Source of the Information**

Information directly submitted by a consumer online or offline; information collected pursuant to a transaction; information collected through communications with our customer service department; information automatically collected online (on our Site and elsewhere on the internet).

#### **Purpose for Collection**

To administer and manage the Site; to deliver our services to our customers; security and fraud prevention; to develop our businesses and services; internal business operations; to process, evaluate and respond to requests and inquiries; to conduct marketing activities, including generating leads determining and managing the effectiveness of our own and our

customers' advertising and marketing campaigns; to monitor and enforce compliance with our terms; and/or any other purposes for which you provided the information

**Information Disclosed for a Business or Commercial Purpose? (Yes/No)**

Yes

**Categories of Third Parties (Which Does Not Include Service Providers) with whom the Your Information is Shared**

Business partners, customers, third party web tracking providers, and marketing channels.

**Demographic Information**

**Source of the Information**

Information directly submitted by a consumer online or offline; information collected pursuant to a transaction; information collected through communications with our customer service department; information automatically collected online (on our Site and elsewhere on the internet).

**Purpose for Collection**

To administer and manage the Site; to deliver our services to our customers; security and fraud prevention; to develop our businesses and services; internal business operations; to process, evaluate and respond to requests and inquiries; to conduct marketing activities, including generating leads determining and managing the effectiveness of our own and our customers' advertising and marketing campaigns; to monitor and enforce compliance with our terms; and/or any other purposes for which you provided the information.

**Information Disclosed for a Business or Commercial Purpose? (Yes/No)**

Yes

**Categories of Third Parties (Which Does Not Include Service Providers) with whom the Your Information is Shared**

Business partners, customers, third party web tracking providers, and marketing channels.

**Financial Account Information**

**Source of the Information**

Provided by users.

**Purpose for Collection**

To complete a transaction requested by the consumer.

**Information Disclosed for a Business or Commercial Purpose? (Yes/No)**

Yes

**Categories of Third Parties (Which Does Not Include Service Providers) with whom the Your Information is Shared**

N/A

**Commercial Information (e.g., purchase histories)****Source of the Information**

Information directly submitted by a consumer online or offline; information collected pursuant to a transaction; information collected through communications with our customer service department; information automatically collected online (on our Site and elsewhere on the internet).

**Purpose for Collection**

To administer and manage the Site; to deliver our services to our customers; security and fraud prevention; to develop our businesses and services; internal business operations; to process, evaluate and respond to requests and inquiries; to conduct marketing activities, including generating leads determining and managing the effectiveness of our own and our customers' advertising and marketing campaigns; to monitor and enforce compliance with our terms; and/or any other purposes for which you provided the information.

**Information Disclosed for a Business or Commercial Purpose? (Yes/No)**

Yes

**Categories of Third Parties (Which Does Not Include Service Providers) with whom the Your Information is Shared**

Business partners, customers, third party web tracking providers, and marketing channels.

## **Website Browsing Activity**

### **Source of the Information**

Information directly submitted by a consumer online or offline; information collected pursuant to a transaction; information collected through communications with our customer service department; information automatically collected online (on our Site and elsewhere on the internet).

### **Purpose for Collection**

To administer and manage the Site; to deliver our services to our customers; security and fraud prevention; to develop our businesses and services; internal business operations; to process, evaluate and respond to requests and inquiries; to conduct marketing activities, including generating leads determining and managing the effectiveness of our own and our customers' advertising and marketing campaigns; to monitor and enforce compliance with our terms; and/or any other purposes for which you provided the information.

### **Information Disclosed for a Business or Commercial Purpose? (Yes/No)**

Yes

### **Categories of Third Parties (Which Does Not Include Service Providers) with whom the Your Information is Shared**

Business partners, customers, third party web tracking providers, and marketing channels.

Use of Personal Information: If we do receive your personal information, we will only use it for the purposes described where it is collected or otherwise described in this Privacy Policy. We may share this information outside of Legacy Investing if (1) you authorize us to do so; (2) it is necessary to allow our service providers or agents to provide products or services for us, (3) it is necessary in order to provide our products or services, or our clients' products or services, to you (and contacting you when necessary), (4) subject to applicable contractual or legal restrictions, it is disclosed to entities that perform marketing services on our behalf or to other entities with whom we have joint marketing agreements, (5) subject to applicable contractual or legal restrictions, it is necessary in connection with a sale of all or substantially all of the assets of Legacy Investing or the merger of Legacy Investing into another entity or any consolidation, share exchange, combination, reorganization, or like transaction in which Legacy Investing is not the survivor, (6) it is necessary in connection with other business purposes including, without limitation, responding to your inquiries or requests for information or services, customer care, service quality, business management and operation, risk assessment, security,

fraud and crime prevention/detection, monitoring, research and analysis, marketing, customer purchasing preferences and trends, dispute resolution, credit checking and debt collection, (7) it is necessary to disclose in order to protect or defend our rights or property or those of our users, (8) it is necessary to disclose in order to protect the personal safety of our users or the public, (9) it is necessary for us to provide it to our attorneys, accountants, regulators, auditors or other advisors, or (10) otherwise as we are required or permitted by law or required to comply with legal process served upon us, our agents, clients, representatives or our affiliates. We may also aggregate your personal information with the information of others and may disclose such information in aggregate form for marketing and promotional purposes in a way that would not identify you individually.

**Use of Non-Personally Identifiable Information:** We may use non-personally identifiable information as part of the Services to better tailor advertisements and other content in an effort to create a more relevant experience for each person that visits the Site or elsewhere on the Internet. This non-personally identifiable information may also be used to predict responses to advertisements, to help determine which ads perform best and which content is most appropriate for different individuals, to measure and optimize the effectiveness of advertisements, and to provide aggregate reporting to advertisers and clients and for our and their internal purposes. We use various web site analytics tools and technologies regarding activities on our Site that require storage of web session data. The overall aim of these tools is to aid in making our Site easy to use, to proactively identify and correct error conditions and to provide more relevant advertising and content to you. These tools and technologies are also used to assist Site visitors who report problems in the use of our Site. Stored web session data is used in accordance with this Privacy Policy.

**Third Party Use of Cookies:** We use cookies to compile aggregate non-personally identifiable data about Site traffic and Site interaction so that we can offer better Site experiences and tools in the future. We may also share non-personally identifiable information with companies such as advertisers, agencies, ad networks, or exchanges to enable them to analyze user behaviors or to customize the ads that you encounter.

**Contests, Sweepstakes and Other Promotions:** On our Site, you may wish to participate in contests, sweepstakes and other promotions that we may offer from time to time. Through these promotions, you may choose to participate in activities such as sharing information found on our Site with others and sending e-mail invitations. In connection with any contests, sweepstakes and other promotions that we may offer from time to time via our Site, we use the information you provide to administer the contests, sweepstakes and other promotions. Subject to applicable contractual or legal restrictions, we also may use the information to communicate with you, or the other people you select, about our or our

clients' products and services or our partners may use such information to communicate with you about the contests, sweepstakes or other promotions or their products and services. If you choose to participate in these promotions, and are eligible to do so, we may ask you for information such as your name, e-mail address, date of birth and telephone number.

### **Email Signups**

E-mail: We appreciate your questions and comments about our Site and services and welcome your e-mails and questions submitted to our Site. We will share your messages with those within our organization who are most capable of addressing the issues contained in your message. We may archive your message for a certain period of time or discard it, but your e-mail address and message will only be used in accordance with this Privacy Policy.

Suggesting the Site to a Friend: If you elect to use any feature that includes suggesting a page to a friend or to inform a friend about the Site or solicit donations or pledges or otherwise communicate, Legacy Investing Data Centers may ask for your friend's name and e-mail address. The Site may automatically send the friend a one-time e-mail inviting them to visit the Sites or otherwise provide the information requested by you. Legacy Investing will store and use this information in accordance with this Privacy Policy. Your friend may contact Legacy Investing to request the removal of this information from our databases.

### **Security**

We employ and maintain technology and security measures designed to protect your personal information. However, no data transmission over the Internet can be guaranteed as 100% secure. As a result, while we strive to protect your information, we cannot ensure or warrant the security of any information you transmit to us or receive from us.

### **Digital Advertising Alliance**

This Site adheres to the Digital Advertising Alliance's ("DAA") Self-Regulatory Principles for Online Behavioral Advertising, which administers a program to help inform consumers about data collection and advertising practices and provides consumers a means to exercise choice with respect to certain advertising practices of participating companies. For more information about the DAA and the choices available via the program, please visit the DAA web site at [www.aboutads.info](http://www.aboutads.info).

## **Your California Privacy Rights**

California Privacy Rights: This portion of our Privacy Policy describes specific rights under the California Consumer Privacy Act (“**CCPA**”). Please note that we will seek to verify your identity when we receive an individual rights request from you in order to ensure the security of your information.

Please direct any rights requests (as further described below) or additional questions you may have regarding this Privacy Policy via email to: [info@legacyinvesting.com](mailto:info@legacyinvesting.com)

If you do, we will need to collect your information such as your name, email or transaction history in order to verify your identity. You may also authorize an agent to make a request on your behalf, who will need to provide similar information for verification.

**Deletion:** California residents have the right to request the deletion of information. Legacy Investing Data Centers may not delete some or all requested personal data as required or allowed by applicable law.

**Access:** You may request to receive details about how we collect, use, and share your personal data. Specifically, you may request to receive the specific pieces of personal data that we have collected about you.

**Opt-Out of Sale:** If you would like to opt-out of the sale of your information, please click [here](#).

**Non-Discrimination:** We do not discriminate against you for exercising any CCPA rights, such as the access and deletion rights described above. If we choose to offer a product enhancement or financial incentive that is contingent on you sharing personal information, we will ensure that the value provided to us by that collection is reasonably related to the value of the product enhancement or financial incentive.

**Shine the Light:** Under California Law, California residents have the right to request in writing from businesses with whom they have an established business relationship, (a) a list of the categories of personal information, such as name, e-mail and mailing address and the type of services provided to the customer, that a business has disclosed to third parties (including affiliates that are separate legal entities) during the immediately preceding calendar year for the third parties’ direct marketing purposes, and (b) the names and addresses of all such third parties. To request the above information, please contact Legacy Investing on our Site or write to us at (with a reference to California Disclosure Information):

Legacy Investing  
Attn: Counsel  
3100 Clarendon Blvd, Suite 1050  
Arlington, VA 22201  
Email: [info@legacyinvesting.com](mailto:info@legacyinvesting.com)

We will respond to such requests for information access within thirty (30) days following receipt at the e-mail or mailing address stated above. Please note that we are only required to respond to each customer once per calendar year.

Like many other websites and online services, Legacy Investing Data Centers does not currently alter its practices when it receives “Do Not Track” signals. To find out more about “Do Not Track,” you may wish to visit <http://www.allaboutdnt.com>.

### **Children**

We strongly encourage parents and guardians to regularly monitor and supervise their children’s online activities. We do not knowingly collect personal information from children under 13 years of age. If you are under 13, do not use or provide any information on this Site or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us.

### **Special Statement for Job Applicants**

Any personal information that you provide to us when applying for a career position with Legacy Investing will be used solely to consider and act upon your application. We may retain your personal information for a period of time, but only for as long as necessary for such purposes or as otherwise required or permitted by law. We may disclose your personal information to our agents for the purpose of evaluating your qualifications for the particular position you applied for, for other available positions or as otherwise required by law. We may also disclose your personal information to third parties hired by us to collect, maintain, and analyze candidates for career positions or as otherwise required by law.

### **Visiting Our Site from Outside of the United States**

If you are visiting our Site from outside of the United States of America, please be aware that your information may be transferred to, stored or processed in the United States,

where our servers are located and our central database is operated. The data protection and other laws of the United States and other countries might not be as comprehensive as those in your country, but please be assured that we take steps to protect your privacy. By using our Site, you understand that your information may be transferred to our facilities and those third parties with whom we share it as described in this Privacy Policy.

### **Contact Us**

You can update your preferences, submit a request, exercise your privacy rights or ask us questions about this Privacy Notice by emailing us at [info@legacyinvesting.com](mailto:info@legacyinvesting.com) or writing to us at:

Legacy Investing  
3100 Clarendon Blvd  
Suite 1050, Arlington VA 22201

**Effective: January 6, 2026**