

AFINITIV LLC — PRIVACY POLICY

Effective October 6th, 2026

Welcome to Afinitiv. We work hard to protect your personal information and ensure your information is kept private and secure. This privacy policy explains what personal information Afinitiv LLC (“Afinitiv”, “we”, “us”) collects, including through our website (www.afinitiv.com) and our online onboarding questionnaire, why we collect it, how we use and share it, and how we protect it. It also serves as our privacy notice under Regulation S-P of the U.S. Securities and Exchange Commission.

Your account is opened and held with our custodian, Interactive Brokers. Information you provide to Interactive Brokers during account opening is also governed by Interactive Brokers’ own privacy policy.

We will never rent or sell your information to anyone. If you have any questions or if you believe that we have not adhered to this privacy policy, please contact us at welcometoafinitiv.com.

Information We Collect and Why

In order to provide our services and to meet our legal and regulatory obligations, and those of our custodian, we collect the following types of information.

Visitor Information

When you visit our website we collect device-related information (including browser type and IP address) and log information (including the date and time of your visit, pages viewed, and the site that referred you to us). We use this information to understand our visitors, facilitate site navigation, keep the website secure, provide the services or information you request, and improve our service.

Onboarding Information

When you complete our online questionnaire and accept our Investment Management Agreement, we collect your full name, email address and (if provided) telephone number; the account type you select; your responses to the questionnaire, including information about your investment experience, financial circumstances, investment horizon and risk tolerance; the portfolio you are matched to; your confirmations and electronic-signature consent; and technical information recorded at the time of acceptance (date and time, IP address, browser and approximate country). We keep this record, together with a fingerprint of each disclosure document you acknowledged, as evidence of your agreement.

Account Information

To open and maintain your account, our custodian collects information such as your legal name, residential address, date of birth, Social Security or tax identification number, government identification, employment and financial information, and bank details. We receive account information from our custodian, including holdings, transactions, balances and statements, so that we can manage your account and charge our fee. We are required by law to obtain certain of this information before we can provide you with advisory services. If you do not wish to provide it, you cannot become an Afinitiv client.

Other Ways We Collect Information

We may also collect personal information if you contact us by email, follow or engage with our social media profiles, or communicate with one of our Ambassadors.

Cookies and Analytics

Cookies are small pieces of data stored on your device. We use cookies and similar technologies, including Google Tag Manager and Google Analytics, to understand how our website is used and to improve it. These services collect information such as pages visited, the site that referred you, device and browser type, and IP address; they do not receive your name or the answers you give in our questionnaire. You can prevent Google Analytics from recognising you on return visits by disabling cookies in your browser or by installing

the Google Analytics Opt-out Browser Add-on. Cookies are not required to use our website, although some features may work less well without them.

We may advertise our services on websites not affiliated with us. Any advertising partners we use may use cookies to collect technical and navigational information, but we do not provide them with information that personally identifies our clients. You can opt out of some interest-based advertising by visiting the NAI Opt-Out Page.

How We Use Your Personal Information

We use your personal information to provide investment advisory services; match you to a portfolio and manage your account; communicate with you and provide client support; meet our legal, regulatory and record-keeping obligations, including anti-money-laundering and sanctions screening; protect the security and integrity of our services; improve our services; and, where permitted, tell you about our own services. You can unsubscribe from marketing emails at any time using the link in each message; you cannot opt out of communications we are required to send about your account.

We may use anonymised or aggregated information, from which no client can be identified, for analysis and reporting.

How We Share Your Information

We do not sell, rent, or trade your personal information. We share it only as follows:

- **Our custodian and broker-dealer** (Interactive Brokers), to open, operate and trade your account.
- **Service providers** who perform services on our behalf, such as website hosting and security (Cloudflare), analytics, identity verification, email, professional advisers and auditors. We require service providers to protect your information and to use it only to perform services for us.
- **Other financial institutions** you ask us to deal with, for example when you transfer assets.
- **Regulators and authorities**, in response to legal process or where permitted or required by law, including to prevent fraud or other illegal activity.
- **With your consent**, or with persons you authorise.

We do not share your personal information with our affiliates or with non-affiliated third parties for their own marketing. Because we share information only as described above, Regulation S-P does not require us to offer you an opt-out.

How Your Personal Information is Protected

We maintain administrative, technical and physical safeguards designed to protect your personal information, including encryption in transit, access controls that limit access to personnel and service providers who need it to perform their functions, and tamper-evident records of client submissions. We oversee our service providers' handling of client information.

We maintain an incident response program to detect, respond to and recover from unauthorised access to or use of client information. If sensitive information about you is, or is reasonably likely to have been, accessed or used without authorisation, we will notify you as soon as practicable and in any event within 30 days of becoming aware of the incident (unless a delay is requested by law enforcement), explaining what happened, what information was involved, and what you can do to protect yourself.

You are responsible for keeping the login credentials for your custodian account confidential.

Accessing or Correcting Your Information

You may ask us to access or correct the personal information we hold about you by contacting us at welcome@afinitiv.com. You can update your questionnaire responses through our website. Information held by our custodian can be updated through your Interactive Brokers account.

Retention

We retain client records for as long as required by law. Under the Investment Advisers Act of 1940, most advisory records must be kept for at least five years, so we cannot delete them on request during that period. Former clients' information is protected in the same way as current clients' information.

Other Important Information

Do Not Track Signals

Some browsers can send a "Do Not Track" signal. Our website does not currently respond to these signals.

Children

Our services are not directed to anyone under the age of 18 and we do not knowingly collect information from children. If you believe a child has provided us with personal information, please contact us at welcome@afinitiv.com and we will delete it.

International Visitors

Our services are provided from the United States. If you provide personal information from outside the United States, it will be transferred to and processed in the United States, which may not have the same data protection laws as your country.

Changes to this Policy

We may update this policy from time to time by posting a new version on our website with a new effective date. If changes are material, we will notify clients by email. We will also provide clients with this notice at the start of the relationship and annually where required by law.

Your Rights as a California Resident

This section supplements this policy for residents of California. Much of the personal information we collect from clients is collected under the federal Gramm-Leach-Bliley Act and is exempt from the California Consumer Privacy Act ("CCPA"); this section applies to other personal information, such as website visitor information, to the extent the CCPA applies to us.

In the preceding twelve months we have collected the following categories of personal information: identifiers (such as name, email address, telephone number, IP address and online identifiers); personal information described in Cal. Civ. Code § 1798.80(e) (such as financial information); protected classification characteristics (such as age); internet or network activity on our website; approximate geolocation derived from IP address; and professional or employment-related information. We collect it directly from you, from your activity on our website, from our custodian, and from Ambassadors who introduce you to us. We use and disclose it for the business purposes described in this policy, to the categories of recipients described above.

We do not sell personal information, and we do not use or disclose sensitive personal information other than to provide our services. Subject to legal exceptions, you have the right to request to know the personal information we have collected about you, to request its correction, and to request its deletion (except where we are required to retain it). To make a request, email welcome@afinitiv.com. We will verify your identity before responding, acknowledge your request within 10 business days, and respond within 45 days (or up to 90 days where necessary, in which case we will tell you why). You may use an authorised agent. We will not discriminate against you for exercising these rights.

Your Rights as a Vermont Resident

We do not share nonpublic personal financial information about Vermont residents with non-affiliated third parties except for our everyday business purposes or as otherwise permitted by law.

Contact

