

Motley Fool Wealth Management, LLC

Our Privacy Notice

This Privacy Notice (“Notice”) explains the types of personal information (as defined below) that we collect, how we use it, who we share it with, how we protect it, and your legal rights. Please read the following carefully as it explains our views and practices regarding your personal information and how it is handled. By using our Website (the “Website”), you acknowledge you have read and understood this Notice. Clients of Motley Fool Wealth Management will be provided with this Notice at the outset of the client-relationship, along with annual updates, if and when required by applicable law.

For purposes of this Notice, “**Personal Information**” means information that (either in isolation or in combination with other available information) enables you to be identified as an individual or recognized directly or indirectly, in particular by reference to, among other things, an identifier such as name, identification number, location data, and any online identifier. It would not include aggregate or deidentified information or various types of publicly available information. With respect to Motley Fool Wealth Management (“MFWM” or the “Firm”) clients, personal information includes, among other things, personal financial information that is not publicly available, such as account balances, social security numbers, and net worth.

As you may know, MFWM is an indirect, wholly-owned subsidiary of The Motley Fool Holdings, Inc. (“Holdings”). Holdings also indirectly owns other regulated financial services companies (e.g., other investment advisers) and financial media companies, including The Motley Fool, LLC (“TMF”) (provider of Fool.com and several investment publication services). MFWM, an affiliate of TMF, is an investment adviser registered with the U.S. Securities and Exchange Commission. MFWM is a separate entity, and all investment advisory and financial planning services are provided independently by the portfolio managers and financial planners at the Firm. No TMF analysts are involved in the investment decision-making or daily operations of our Firm. For the purposes of this Notice, neither TMF nor any other affiliated entities are considered third parties. Each affiliated entity maintains and makes available its own privacy policy and/or notice in accordance with applicable law.

If you are a resident of any of the following jurisdictions, you can find additional information on our privacy policies in the Appendices:

European Union. If you are a resident of the European Union and wish to use our Website, you can find information on our data policies that pertain to you below in **Appendix A**. In addition, if you wish to utilize our investment advisory and financial planning services (if permitted under applicable law), **Appendix B** contains our privacy statement for European clients.

California. If you are a resident of California, you can find additional information in **Appendix C**.

Categories of Personal Information Collected by MFWM

Classification of Personal Information	Types of Data Collected	Reasoning for Collecting and Sharing Personal Information
Personal Information Collected from Our Website	<ul style="list-style-type: none"> ● URL ● IP address ● Pages of our Website you have visited ● Cookies ● Pixels ● Location data <p>Individuals may also provide the following information by filling out forms on our website:</p> <ul style="list-style-type: none"> ● First and last name ● Email Address ● Phone number ● Retirement status ● Estimate of investable assets 	<ul style="list-style-type: none"> ● To help us analyze and determine our audience’s behavioral characteristics ● To help us improve user experience ● To advertise our products and services ● To reach out to individuals who have expressed interest in our products and services ● To familiarize our service team with your financial situation
Personal Information Received from Other Sources	<ul style="list-style-type: none"> ● Cookies ● Pixels ● Beacons ● Other technologies to collect and use information about you during your visit to our Website and other websites 	<p>To send to our affiliates and third parties:</p> <ul style="list-style-type: none"> ● To process information about our users on our behalf ● To help us improve our website ● To help us find prospective clients
Personal Information from Clients and Prospective Clients	<ul style="list-style-type: none"> ● Full Name ● Location/residential address ● Income and assets ● Account balances ● Transaction history ● Debt and risk tolerances ● Date of birth ● SSN ● information with respect to securities-related criminal convictions or regulatory enforcement actions ● Name and contact information for beneficiaries and/or trusted contacts 	<ul style="list-style-type: none"> ● To open and maintain a separately managed account and to enter into an investment advisory agreement ● To share with Custodians in order to provide brokerage and account administration services

1. The Information We Collect About You

We will collect and process the following personal information from you:

1.1 Personal Information We Collect About You From Using the Website:

While on the Website, we automatically log certain information about how you're using our Website. This information may include the URL that you just came from, your IP address (or a partially anonymized IP address) and the pages you visit while on our Website.

We may place a pixel on pages on our Website, or pages of third-parties where we have advertisement. This enables us to record in our server logs that a specific user ID has visited a particular page or advertisement. This data allows us to analyze and determine our audience's behavioral characteristics, which helps us to optimize our Website and marketing focus. We may also collect personal information from other publicly or commercially available sources.

We also obtain information about you when you voluntarily fill out certain forms on the Website. This may include, among other things, your first and last name, email address, retirement status, estimate of investable assets, and phone number.

1.2 Personal Information We Receive From Other Sources:

We allow our affiliates and third parties to collect certain personal information when you visit our Website. They may utilize cookies, pixels, beacons, or other technologies to collect and use information about you during your visit to this and other websites. We have also engaged third-party companies to process information about our users on our behalf, to help us improve our Website and find prospective investors. These companies will combine our data about how you visit our Website with information that they have collected from outside our Website and provide it to us (and only us) so that we can optimize your experience on www.foolwealth.com across devices and based on your interests.

To learn more about this behavioral advertising, including information on how to opt-out, please visit the [Google Analytics opt-out program](#) to learn how to opt out of having your information collected in browsers for ad serving purposes. For more information on Google's privacy practices for Google Analytics, please visit <https://support.google.com/analytics/answer/6004245> and "How Google uses data when you use our partners' sites or apps" located at www.google.com/policies/privacy/partners.

1.3 Personal Information We Collect from our Clients & Prospective Clients

If you open a Personal Portfolio by establishing an account with one of MFWM's Custodian partners and enter into an investment advisory agreement with MFWM, we collect the following types of personal information:

- Full name;
- Aliases, former names (such as maiden names);
- Residential address;
- Social security number;
- Date of Birth;
- Email address;
- Phone number;
- Income and assets;
- Account balances and transaction history; and
- Risk tolerances.

We also all collect some of this information from prospective clients that are considering our advisory services. In addition, our clients are required to open accounts with Charles Schwab & Co., Inc. and/or

Interactive Brokers, LLC, each an approved custodian for our separately managed account program (the “Custodians”). These custodians provide brokerage and account administration services (e.g., generating quarterly financial statements) for each client and, as such, we provide the Custodians with personal information. We also receive personal information from the Custodians.

2. The Legal Basis We Rely on For Collecting Personal Data

2.1 Consent

We can collect and process your data with your consent. For example, where you have provided us with your email address to receive information about our services, we will use this information in order to effectively deliver and communicate this information.

2.2 Contractual Obligations

We (or a third-party service provider such as a Custodian) need your personal information to comply with our contractual obligations to you as a client.

2.3 Legal Compliance

If the law requires us to, we may need to collect and process your personal information. For example, we can pass on details of people involved in fraud or other criminal activity affecting us to applicable law enforcement.

2.4 Legitimate Interest

We may require your personal information to pursue our legitimate interests in a way which might reasonably be expected as part of running our business and which does not materially impact your rights, freedom or interests. For example, it is in our legitimate interests to ensure that content from the Website is presented in the most effective manner for you and your computer and that we provide you with the information, products and services that you request from us.

3. How We Use Your Information

We will use this information in our legitimate interests, where we have considered these are not overridden by your rights. For example, we may use this information to:

- To administer the Website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- To keep the Website safe and secure;
- For measuring or understanding the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- As described further below under “Our Promotional Updates and Communications,” to keep you informed about our products and services;
- To improve our Website to ensure that content is presented in the most effective manner for you and for your computer;
- Internal research: Cookies (discussed further below) and the other information we automatically track are used to help us better understand how our audience uses our site as well as for internal research on users’ demographics and interests; and

- To leverage Artificial Intelligence (AI) and machine learning tools for enhancing service efficiency, conducting market research, analyzing marketing trends, improving risk management, and ensuring regulatory compliance.

4. Information We Share

4.1 Who We Share With

We do not sell or otherwise disclose Personal Information we collect about you, except as described herein or as you explicitly consent. However, we may share your Personal Information with:

- Our affiliates for purposes of providing you with, and informing you about, their products and services which may be of interest to you;
- We may employ the services of third parties to aid us in certain aspects of our operations (such as the distribution of our email or the provision of AI and automated systems). Depending on the services performed, some of these providers may be provided with user Personal Information. These service providers would be subject to confidentiality agreements which limit their use and disclosure of all Personal Information they obtain through their relationship with MFWM to us and our affiliates only, consistent with this Notice. We further require our service providers to maintain appropriate safeguards to protect your information and to notify us in the event of a security breach affecting your data;
- The Custodians for purposes of managing your account(s); and
- Our sub-adviser, Apollon Wealth Management, LLC (“AWM”). We may share your Personal Information as part of our sub-advisory relationship with Apollon Wealth Management, LLC (“AWM”). This sharing is conducted to facilitate the continuity of investment advisory services during the MFWM’s transition to AWM. AWM, with your consent, will have access to your information to prepare for the transition of services while MFWM continues to manage your assets. AWM is required to maintain the confidentiality of your data and provide appropriate safeguards to protect, consistent with this Privacy Notice.

4.2 Legal Requests

We may disclose your personal information to protect the rights and property of MFWM, as well as to comply with any applicable law or valid legal process. This includes, but is not limited to:

- We will disclose any Personal Information we have in our possession to law enforcement or government officials in response to any inquiry or investigation or if in our sole discretion, we believe it is necessary or appropriate in connection with any investigation or activity that is or may be illegal or may expose us or you to legal liability.
- Disclosures we are legally required or entitled to make under any enactment, rule of law or by the order of a court.

4.3 Transfer of Information to Other Countries

We may transfer the Personal Information we obtain about you to recipients in countries other than the country in which the information was originally collected. Those countries may not have the same data protection laws as the country in which you initially provided your Personal Information. To the extent required by applicable law, when we transfer your Personal Information to recipients in other countries, we will protect that information as described in this Notice and our Privacy Policy.

5. Our Promotional Updates and Communications

Where permitted, we will use your Personal Information for marketing analysis and to provide you with promotional update communications by email about our products/services and those of our affiliates. You can object to further marketing at any time by: (i) selecting the “unsubscribe” link at the end of all our marketing and promotional update communications to you; or (ii) sending us an email to dpo@foolwealth.com; or (iii) by going to the following link to opt out: <https://foolwealth.com/info/ccpa>.

6. How Long We Keep Your Information

To the extent permitted by applicable law, we retain Personal Information we obtain about you as long as: (1) it is needed for the purposes for which we obtained it, in accordance with the provisions of this Notice or (2) we have another lawful basis for retaining the data beyond the period for which it is necessary to serve the original purpose for collecting the data. We may also retain aggregate information beyond this time for research purposes and to help us develop and improve our services. You cannot be identified from aggregate information retained or used for these purposes.

7. Cookies and Other Technologies

Cookies contain bits of data that websites such as ours place on your computer’s hard drive for record-keeping purposes. Cookies can make the web more useful by collecting and storing information about your preferences on a particular site and help websites operate more efficiently. Cookies and similar technologies enable you to be remembered when using that computer or device to interact with websites and online services and can be used to manage a range of features and content as well as storing searches and presenting personalized content.

You have the option of not accepting the cookies we set. However, if you reject our cookies, you will not be able to take advantage of some features on our site.

7.1 Use of Cookies

Cookies are small text files that are stored in your computer's memory and hard drive when you visit certain web pages. They are used to enable websites to function or to provide information to the owners of a website. We use cookies for multiple purposes on the Website, including optimizing the Website, improving user experience and advertising our products and services (and enabling our affiliates to do the same).

7.2 Cookies Set by Third Parties

In addition to the cookies set directly by MFWM or our affiliates, there are also cookies set by third parties to help deliver and monitor their ads. These providers include Google Analytics and HubSpot. Third-party cookies are cookies set by a website other than the website you are currently visiting. These cookies are generally used for advertising and assist advertisers with sharing advertisements that are relevant to you.

Please note we neither control nor have access to those cookies, and these advertisers’ uses of cookies are subject to their own privacy policies and not that of MFWM. If you follow links from the Website to third parties, you should also be aware that these other sites have their own privacy and data processing practices. We have no responsibility or liability for these independent policies. For more information regarding a third-party site and its privacy policies including its use of cookies, check that particular site.

7.3 Cookie Removal and More Information

You can always modify your browser so as not to accept cookies or to notify you when cookies are sent to it. For more information about cookies including removing any or all of your cookies, please visit <http://www.allaboutcookies.org>. If you would like to remove Google Analytics, please go to <http://tools.google.com/dlpage/gaoptout>. You should be aware that this will affect your Google cookies on all sites, and not just ours.

8. Security

We are committed to protecting your Personal Information. All Personal Information that we collect or that you provide to us is stored on our secure servers. While we do our best to protect your Personal Information, we cannot ensure or warrant the security of any information you transmit to us, and you do so at your own risk. Unfortunately, the transmission of information via the internet is not completely secure. We maintain a written information security program, including an incident response program, designed to detect, respond to, and recover from unauthorized access or use of customer information. We use strict procedures and security features to protect your Personal Information. **In the event that we determine that sensitive customer information has been accessed or used without authorization, we will notify affected individuals within 30 days, or as otherwise required by applicable law.**

Third Party Links

Our Website may, from time to time, contain links to external sites (including our social media pages). We are not responsible for the privacy policies or the content of such sites.

AI Security

As a matter of policy, we prohibit the input of Personal Information into public or non-enterprise AI and machine learning products.

Certain service providers may offer or incorporate AI features. We will not engage with or use services for processing Personal Information unless we have an enterprise agreement in place or we have explicit acknowledgement that our data is not used in training the service provider's AI model.

When authorized AI is used to process, analyze, or generate insights from your Personal Information, we employ specific safeguards to ensure privacy:

- AI systems are trained and operated using the minimum necessary data required for their functions.
- Where feasible, data used by AI models is anonymized or pseudonymized to reduce the risk of re-identification.
- Access to Personal Information, including data used by AI, is strictly limited to authorized personnel using role-based controls.

We will disclose our use of AI, machine learning, or other emerging technology in this Notice or through direct communication regarding specific Services.

9. Users Aged 13 or Under

Protecting the safety of children when they use the internet is important to us. The Website is intended for use only by persons who are at least 13 years of age. By using the Website, you confirm to us that you meet this requirement. If you are aged 13 or under, please get your parent/guardian's permission beforehand whenever you provide Personal Information to our Website. Users without this consent are not allowed to provide us with Personal Information.

If you are under the age of 13, your parent or guardian must consent on your behalf where we ask for consent in relation to the use of your Personal Information.

10. **Right to Lodge Complaints**

We are transparent about the ways in which we collect and use Personal Information and welcome your questions and concerns. If you have any concern or complaint about the way we handle your Personal Information, please contact us as described below. To the extent you believe we have not addressed your concerns or otherwise choose to do so, you have the right to lodge a complaint with a supervisory authority in the country where you reside and/or the United States. You may contact the US Federal Trade Commission regarding your concerns. For more information, please see <https://consumer.ftc.gov/media/video-0054-how-file-complaint-federal-trade-commission>.

11. **Changes to This Notice**

We may amend this Notice from time to time. If we make any substantive changes to this Notice, we'll announce it on our Website and notify clients by email.

12. **Opt-Out Notice**

If you wish us to stop sharing your information in certain circumstances, such as with third-party entities for marketing and advertising purposes, please call us at: (844) 408-4390 or go to <https://foolwealth.com/info/ccpa> to opt out. You may also opt out of our marketing emails by clicking the “unsubscribe” link found at the bottom of these emails. Please note we reserve the right to share your information as described herein for business and operational purposes. This includes sharing information with your custodian or other third parties we contract to assist in the management of your accounts. Please review the chart below for a general overview of why we share your information and whether you may request we limit our sharing.

Reasons we share your personal information	Does MFWM Share?	Can you limit this sharing?
For our everyday business purposes Such as to process your transaction, maintain your account(s), provide you with necessary information, or respond to court orders and legal investigation	Yes	No
For our marketing purposes To offer our products and services to you	Yes	Yes
For joint marketing with other financial companies	No	We don't share
For our affiliates' everyday business purposes Information about your transactions and experiences	Yes	No
For our affiliates' everyday business purposes Information about your creditworthiness	No	We don't share
For our affiliates to market to you	Yes	Yes
For non-affiliates to market to you	No	We don't share

If you have any questions about this Notice, please give us a call at (844) 408-4390 or email us at info@foolwealth.com.

Updated: December 2025

European Users

For the purposes of European Union General Data Protection Regulation (EU) 2016/679 (“GDPR”), the data controller is: Motley Fool Wealth Management, 2000 Duke Street, Alexandria, VA 22314, USA (dpo@foolwealth.com).

1. Use of Cookies

Below you’ll find the types of cookies that we set when you visit foolwealth.com and their purpose. To help you better understand why we’re setting them, we’ve used the categories and definitions set by the International Chamber of Commerce (“ICC”):

- **Strictly Necessary:** cookies that enable the services that you have specifically asked or paid for;
- **Performance:** cookies that collect information on how visitors use our Website, including the pages visited and most frequented as well as the sources of our traffic. They are used to help us improve how the Website works;
- **Functionality:** cookies that help us remember the choices you have made so we can provide you with a more personalized experience; and
- **Advertising:** cookies used to deliver more relevant ads, and to make sure you don’t see the same adverts over and over again.

If you have any questions about the cookies we set, please contact our Data Protection Officer at dpo@foolwealth.com.

2. Data Storage

The Personal Information that we collect from you is transferred to, and is stored at, a destination outside the European Economic Area (“EEA”) that is not subject to an equivalent data protection law. For our purposes, the information we collect is processed and stored in the US.

We may transfer your Personal Information outside the EEA:

- In order to store it;
- In order to enable us to provide goods or services to you and, if applicable, fulfil our contract with you. This includes the provision of support services;
- Where we are legally required to do so; and
- In order to facilitate the operation of our and affiliated businesses, where it is in our legitimate interests and we have concluded these are not overridden by your rights.

Where your information is transferred outside the EEA, we will take all steps reasonably necessary to ensure that your data is subject to appropriate safeguards, such as relying on a recognized legal adequacy mechanism, and that it is treated securely and in accordance with this privacy policy.

3. Rights of European Website Users

Under certain circumstances, European users have the following rights:

- to be provided with a copy of your Personal Information held by us;
- to request the rectification or erasure of your Personal Information held by us;
- to request that we restrict the processing of your Personal Information (for example, while we verify or investigate your concerns with this information);
- to object to the further processing of your Personal Information, including the right to object to marketing (as mentioned in Our Promotional Updates and Communications section above); and
- to request that your provided Personal Information be moved to a third party.

Where the processing of your Personal Information by us is based on consent, you have the right to withdraw that consent without detriment at any time by contacting us dpo@foolwealth.com. You can also change your marketing preferences at any time as described in Our Promotional Updates and Communications section.

You can also exercise the rights listed above at any time by contacting us at dpo@foolwealth.com.

4. Links to Third-Party Websites, Apps and Other Features

Our Website may provide links to other websites, apps and features for your convenience and information. The providers of the websites, apps and features may use automated means to collect information regarding your use of our Website and your interactions with the other websites, apps and features. These websites, apps and features may operate independently from us and may have their own privacy notices or policies, which we strongly suggest that you review. To the extent that any website, app or feature is not owned or controlled by us, we are not responsible for the content, any use of the website, app or feature, or the privacy practices (including cookie practices) of the website, app or feature.

5. Compliance and Accountability

If you have any questions or comments regarding this Notice, our privacy practices, or if you would like us to update information or preferences you provided to us, please contact us at:

Data Protection Officer
Motley Fool Wealth Management LLC
2000 Duke Street
Alexandria, VA 22314
dpo@foolwealth.com

We will address your concerns and attempt to resolve any privacy issues in a timely manner, and may contact individuals at our service providers to assist in completing your requested task.

If your request or concern is not satisfactorily resolved by us, you may approach your local data protection authority.

(See https://edpb.europa.eu/about-edpb/about-edpb/members_en).

Reviewed: December 2025

European Privacy Statement

1. **OVERVIEW**

A. Purpose

Motley Fool Wealth Management, LLC (the “Manager”)¹ is sensitive to privacy issues, and it is important to us to protect the information you provide. Accordingly, the Manager provides this privacy and information practices policy (“**Privacy Statement**”) to inform you about the kinds of information we may collect, how we intend to use and share that information, and how you can correct or change such information.

B. Scope

This Privacy Statement describes the ways the Manager manages Personal Information² it receives in the course of its operations involving current, prospective and former clients, (collectively, “**Clients**”). All individuals who process Personal Information on behalf of the Manager are expected to protect such data by adherence to this Privacy Statement.

The Manager complies with the requirements of Regulation (EU) 2016/679 (“**GDPR**”) and the legislation implementing GDPR in EU member states. The Manager adheres to the GDPR Principles of Lawfulness, Fairness and Transparency; Purpose Limitation; Data Minimization; Accuracy of Information; Storage Limitation; Integrity and Confidentiality; and Accountability as set forth in this Privacy Statement.

2. **POLICY**

A. What personal information we collect and how we use it

The types of Personal Information we may collect depends on the nature of the relationship you have with the Manager and the requirements of applicable law. We may process Personal Information using certain AI-driven tools, as detailed below. We do not, however, engage in processing that involves fully automated decision making that produces legal effects or significantly affects you (as defined under Article 22 of the GDPR).³ We do not engage in automated decision making when processing your Personal Information. Below are the legal bases for processing your Personal Information, some of the ways we collect information, and how we use it.

¹ All references to the Manager should be constructed to also include any third party or affiliate to whom they may delegate certain administrative functions in relation to the Manager and/or who support such functions.

² “Personal Information” is any information relating to an identified or identifiable natural person (“Data Subject”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

³ Under the GDPR, Article 22 obligations are triggered if the Manager engages in fully automated decision-making. The Manager is exempt from this, because although the Manager may use AI for operational efficiency, material decisions related to its services and operations, including but not limited to, model construction, asset allocation, or financial planning advice are made by employees of the Manager.

B. Clients

Information the Manager collects from or on behalf of its Clients includes title, name, address, phone number, email address, business or Manager affiliation, government identification (driver's license, passport), financial information (related to, among other things, income, assets and account balances), agreements executed with the Manager and other details Clients may provide. In certain Client engagements, we may collect employee and other information about our Clients, as well as employee or other Personal Information of others who have a relationship or otherwise interact with our Clients.

We process Personal Information about or on behalf of Clients for a variety of business purposes, including (without limitation) to:

- process account opening and asset transfers;
- provide account management and financial planning services;
- respond to questions and requests;
- provide monthly statements and communicate to Clients on matters such as changes to the Manager's policies and disclosure documents;
- leverage AI and automated systems to improve service delivery, compliance, and risk management; and
- other purposes associated with our investment advisory services.

As permitted under the GDPR, we will only use your Personal Information where we have a legal basis to do so, including where the processing is necessary for:

- us to comply with the law;
- the performance of the investment advisory agreement; or
- the Manager's legitimate interests or those of a third party. For example, to:
 - provide account management and financial planning services;
 - respond to questions and requests or otherwise correspond with you in connection with our account management and financial planning services;
 - utilize AI and automated tools for internal operational efficiency and compliance monitoring; and
 - keep internal records.

We only rely on these interests where we have considered that, on balance, our legitimate interests are not overridden by your interests, fundamental rights or freedoms.

C. Right to Opt-Out

You have the right to opt-out of certain uses and disclosures of your Personal Information, as set out in this Privacy Statement. Where you have consented to the Manager's processing of your Personal Information or sensitive Personal Information, subject to applicable legal obligations, you may withdraw that consent at any time and opt-out. Additionally, before we use Personal Information for any new purpose not originally authorized by you, we will provide information regarding the new purpose and give you the opportunity to

opt-in to such secondary uses. If you choose not to opt-in to our secondary use of your Personal Information, we will not process it for that use.

D. Onward Transfer

Information We Share

The Manager does not sell or otherwise disclose Personal Information about you, except as described in this Privacy Statement or as you explicitly consent. The Manager may share Personal Information with:

- The Manager's affiliates for purposes of providing you with, and informing you about, the Manager's group products and services which may be of interest to you. For more information on how the Manager looks after your Personal Information, please review the Manager's Privacy Notice; and
- Its service providers to provide you with the account management and financial planning services that you have subscribed for, effectuate the payment of amounts due in respect of our services, and support and administer investment related activities. These service providers include, but are not limited to, the custodian(s) of your account.

The Manager requires its service providers to agree in writing to maintain confidentiality and security of Personal Information they maintain on its behalf, including to provide at least the same level of protection as required by the GDPR, not to use it for any purpose other than the purpose for which the Manager retained them and to notify the Manager if they make a determination that they can no longer comply with that obligation.

We may disclose information about you: (i) if we are required to do so by law, court order or legal process; or (ii) in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

Transfers of Personal Information outside the European Economic Area

Your Personal Information may be transferred to our partners, associates and relevant authorities in the U.S. for the purposes identified. Any such transfer of Personal Information shall take place only in accordance with and as permitted by the GDPR. Where the Manager transfers Personal Information outside of the European Economic Area ("EEA"), we have put in place data transfer agreements and safeguards using European Commission approved terms. Please be aware that the laws and practices relating to the protection of Personal Information are likely to be different and, in some cases, may be weaker than those within the EEA.

E. Scope of AI Use

In the course of operating our business and providing services, we may leverage AI or machine learning primarily for internal purposes. This process is based on our legitimate interests in enhancing service efficiency, security, and regulatory adherence.

We employ technical and organizational measures to protect your personal information used in AI systems. As a general matter, organizational policies prohibit us from inputting your Personal Information into AI systems. There may be instances, such as developing our own AI models, where we implement techniques to de-identify, anonymize, or aggregate your personal information before it is used in the development, training, or testing of our AI models. This ensures the data used for model development is not reasonably linkable back to you as an individual.

Whenever feasible, we implement techniques to de-identify, anonymize, or aggregate your Personal Information before it is used.

F. Individual Rights of Access and Choice

The Manager adheres to applicable data protection laws in the EEA, which, if applicable under the GDPR, include the following rights:

- If the processing of Personal Information is based on your consent, you have a right to withdraw consent at any time for future processing;
- You have a right to request from us, where we act as a “data controller” as defined in the law, access to and rectification of your Personal Information;
- The right to have incomplete or inaccurate Personal Information corrected;
- In some limited circumstances, the right to receive some personal data in a structured, commonly used and machine-readable format and/or request that the Manager transmit such data to a third party where this is technically feasible;
- You have a right to lodge a complaint with a data protection authority;
- The right to restrict the use of your Personal Information;
- The right to ask us to stop processing your Personal Information in some limited circumstances; and
- The right to ask us to delete your Personal Information in some limited circumstances.

Although the Manager makes good faith efforts to provide individuals with access to their Personal Information, there may be circumstances in which the Manager is unable to provide access, including but not limited to: where the information contains legal privilege, would compromise others’ privacy or other legitimate rights, where the burden or expense of providing access would be disproportionate to the risks to the individual’s privacy in the case in question or where the information is commercially proprietary. If the Manager determines that access should be restricted in any particular instance, we will endeavor to provide you with an explanation of why that determination has been made and a contact point for any further inquiries. To protect your privacy, the Manager will take commercially reasonable steps to verify your identity before granting access to or making any changes to your Personal Information.

G. Retention

The Manager retains Personal Information that it receives in order to fulfill the purpose(s) for which the information was collected, to provide investment services, conduct audits, enforce Manager agreements and comply with all applicable laws and in accordance with our routine information storage policies. At the point at which the Manager ceases to provide you with investment services, the Manager will retain your Personal Information that it has received for a maximum of 15 years, unless there is ongoing litigation or a similar reason that requires us to retain the Personal Information.

H. Security

The security of all Personal Information provided to the Manager is important to us, and the Manager takes reasonable steps designed to protect your Personal Information. The Manager maintains administrative, technical and physical safeguards designed to protect Personal Information that is received against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use.

I. Redress/Compliance and Accountability

If you have any questions or comments regarding this Privacy Statement, the Manager's privacy practices, or if you would like us to update information or preferences you provided to us, please contact us via email at info@foolwealth.com.

The Manager will address your concerns and attempt to resolve any privacy issues in a timely manner, and may contact individuals at the Manager's service providers to assist in completing your requested task.

Please be aware that you also have a right to approach the body regulating data protection for your country with any concerns you may have.

J. Changes to this Privacy Statement

The Manager may update this Privacy Statement from time to time as it deems necessary or appropriate in its sole discretion. If there are any material changes to this Privacy Statement, the Manager will notify you in a practical manner.

Reviewed: December 2025

Additional Information for California Residents

This section supplements the information contained in the other sections of the Privacy Notice and applies solely to clients, visitors, users, and others who reside in the state of California (“consumers” or “you”) and for whom we have data that are subject to the California Consumer Privacy Act of 2018 as may be amended or supplemented from time to time (“CCPA”). This Privacy Notice, including this additional information, is provided to comply with the CCPA and other California privacy laws. Any terms defined in the CCPA have the same meaning when used in this section.

It is important to note, however, that the CCPA does not apply to all entities, nor does it apply to Personal Information maintained by financial services firms that are covered under certain exemptions described in the CCPA, and as such, the CCPA may not apply to Personal Information we maintain about you.

For the 12-month period prior to the date of this Privacy Notice, we have not “sold” (as that term is defined under the CCPA) any of your information.

Depending upon how you interact with us, you may have various rights in connection with our processing of your Personal Information, each of which is explained below.

- **Access.** You may have the right to confirm with us whether your Personal Information is processed and, if it is, to request access to that Personal Information, including the categories of Personal Information processed, the purpose of the processing, and the recipients or categories of recipients. We do have to consider the interests of others though, so this is not an absolute right and there are additional exceptions under the CCPA. Also, we are not obligated to respond to more than two access requests for the same individual’s Personal Information within any 12-month period.
- **Deletion.** You may have the right to ask us to erase Personal Information concerning you, except we are not obligated to do so if we need to retain such data in order to comply with a legal obligation or to establish, exercise, or defend legal claims or under other exceptions under the CCPA.

If your request is for data relating to you that is de-identified or aggregated so that it is no longer Personal Information, we are not required to re-identify the data to respond to your request. You have a right to receive nondiscriminatory treatment for the exercise of the privacy rights conferred by the CCPA.

Making your own privacy rights request: To exercise one or more of these rights, please contact us as explained below. Please note that we may need to verify your identity before we can fulfill your request. Verification can involve matching up to three pieces of your personal data (as provided on your request) with our internal records. You can submit your request via email at dpo@foolwealth.com or calling us at (844) 408-4390.

Authorized agent requests: An access and/or deletion request also may be made by someone else you authorize specifically to make such a request under the CCPA or by someone you have named as your agent under a power of attorney that is valid under the California Probate Code.

Handling requests we receive: If we need additional information to verify your identity, we will let you know. We will endeavor to respond to a verified request within 45 days, unless there are grounds for extending our response timeframe by up to an additional 45 days. In the event of an extension, we will explain to you why the extension is necessary. In some cases, your ability to access or delete your Personal Information will be limited, as required or permitted by applicable law, even when the CCPA applies to the Personal Information we have for you. If we cannot fulfill your request because we cannot verify your identity or due to exceptions under the CCPA (or when the CCPA does not apply to the Personal Information), we'll let you know in our response.

Reviewed: December 2025