



Consumer Privacy Disclosure Policy

Effective: August 1, 2025

Important Information About Your Privacy

ClearTrust, LLC ("ClearTrust," "we," "us," or "our") is committed to protecting the privacy of shareholders and website users. **ClearTrust does not ever sell your information.** As a stock transfer agent, we maintain shareholder records for publicly traded companies and are subject to federal privacy regulations. This Privacy Notice explains how we collect, use, share, and protect your personal information in compliance with the California Consumer Privacy Act (CCPA), the General Data Protection Regulation (GDPR), and Regulation S-P.

By using our services or website, you agree to the collection and use of information in accordance with this Privacy Notice.

Our Role and Your Relationship With Us

Transfer Agent Services

When you become a registered shareholder of companies we serve as transfer agent, we maintain your shareholder records and personal information. Even though the issuer company pays our fees, we have direct legal obligations to protect your personal information under federal privacy regulations. We use Your Personal data to provide and improve our Service.

Website Services

We collect information when you visit our website or use our online services to access your shareholder account or obtain information about our services.

By using the Service, You agree to the collection and use of information in accordance with this Privacy Disclosure Policy.

Last updated: August 1, 2025

INTERPRETATION AND DEFINITIONS

Interpretation

The words of which the initial letter is capitalized have meanings defined under the following conditions. The following definitions shall have the same meaning regardless of whether they appear in singular or in plural.

Definitions

For the purposes of this Privacy Policy:

Account means a unique account created for You to access our Service or parts of our Service.

Business, for the purpose of the CCPA (California Consumer Privacy Act), refers to the Company as the legal entity that collects Consumers' personal information and determines the purposes and means of the processing of Consumers' personal information, or on behalf of which such information is collected and that alone, or jointly with others, determines the purposes and means of the processing of consumers' personal information, that does business in the State of California.

Company (referred to as either "the Company", "We", "Us" or "Our" in this Agreement) refers to ClearTrust, LLC, 16540 Pointe Village Dr, Ste 210, Lutz, FL 33558. For the purpose of the GDPR, the Company is the Data Controller.

Consumer, for the purpose of the CCPA (California Consumer Privacy Act), means a natural person who is a California resident. A resident, as defined in the law, includes (1) every individual who is in the USA for other than a temporary or transitory purpose, and (2) every individual who is domiciled in the USA who is outside the USA for a temporary or transitory purpose.

Cookies are small files that are placed on Your computer, mobile device or any other device by a website, containing the details of Your browsing history on that website among its many uses.

Country refers to: Florida, United States

Customer (under Regulation S-P) means individual shareholders for whom we maintain records as transfer agent.

Data Controller, for the purposes of the GDPR (General Data Protection Regulation), refers to the Company as the legal person which alone or jointly with others determines the purposes and means of the processing of Personal Data.

Data Subject (under GDPR) means individuals whose personal data we process.

Device means any device that can access the Service such as a computer, a cellphone or a digital tablet.

Do Not Track (DNT) is a concept that has been promoted by US regulatory authorities, in particular the U.S. Federal Trade Commission (FTC), for the Internet industry to develop and implement a mechanism for allowing internet users to control the tracking of their online activities across websites.

Personal Data is any information that relates to an identified or identifiable individual.

For the purposes for GDPR, Personal Data means any information relating to You such as a name, an identification number, location data, online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity.

For the purposes of the CCPA, Personal Data means any information that identifies, relates to, describes or is capable of being associated with, or could reasonably be linked, directly or indirectly, with You.

Sale, for the purpose of the CCPA (California Consumer Privacy Act), means selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a Consumer's Personal information to another business or a third party for monetary or other valuable consideration.

Service refers to using the Website, and also refers to any service the Company performs for You, directly or indirectly, in fulfilling its role as a stock transfer agent or paying agent on behalf of Our issuer clients.

Service Provider means any natural or legal person who processes the data on behalf of the Company. It refers to third-party companies or individuals employed by the Company to facilitate the Service, to provide the Service on behalf of the Company, to perform services related to the Service or to assist the Company in analyzing how the Service is used. For the purpose of the GDPR, Service Providers are considered Data Processors.

Third-party Social Media Service refers to any website or any social network website through which a User can log in or create an account to use the Service.

Usage Data refers to data collected automatically, either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).

Website refers to ClearTrust, accessible from <https://cleartrustonline.com/> and <https://cleartrustonline.net/>.

You means the individual accessing or using or benefiting from the Service, or the company, or other legal entity on behalf of which such individual is accessing or using the Service, as applicable.

Under GDPR (General Data Protection Regulation), You can be referred to as the Data Subject or as the User as you are the individual using the Service.

COLLECTING AND USING YOUR PERSONAL DATA

Types of Data Collected

Personal Data

While using Our Service, We may ask You to provide Us with certain personally identifiable information that can be used to contact or identify You. Personally identifiable information may include, but is not limited to:

- Email address
- First name and last name
- Phone number
- Address, State, Province, ZIP/Postal code, City
- Social Security Number (SSN) or Employer Identification Number (EIN)
- Other government-issued identification numbers (for Patriot Act compliance)

- Bank account information in order to pay for products and/or services within the Service
- ACH or wire transfer details (for dividend-paying or cash activities only)
- Usage Data

Account and Financial Information:

- Account numbers and shareholder identification numbers
- Share ownership details and transaction history
- Dividend payment information and preferences
- Bank account information for payments and transfers
- ACH or wire transfer details

Transaction and Communication Records:

- Records of transactions, transfers, and corporate actions
- Communication history with us (phone calls, emails, letters)
- Customer service interactions and requests

When You pay for a product and/or a service via bank transfer, We may ask You to provide information to facilitate this transaction and to verify Your identity. Such information may include, without limitation:

- Date of birth
- Passport or National ID card
- Bank card statement
- Other information linking You to an address

Usage Data

Usage Data is collected automatically when using the Service.

Usage Data may include information such as Your Device's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that You visit, the time and date of Your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When You access the Service by or through a mobile device, We may collect certain information automatically, including, but not limited to, the type of mobile device You use, Your mobile device unique ID, the IP address of Your mobile device, Your mobile operating

system, the type of mobile Internet browser You use, unique device identifiers and other diagnostic data.

We may also collect information that Your browser sends whenever You visit our Service or when You access the Service by or through a mobile device.

Tracking Technologies and Cookies

We use Cookies and similar tracking technologies to track the activity on Our Service and store certain information. Tracking technologies used are beacons, tags, and scripts to collect and track information and to improve and analyze Our Service.

You can instruct Your browser to refuse all Cookies or to indicate when a Cookie is being sent. However, if You do not accept Cookies, You may not be able to use some parts of our Service.

Cookies can be "Persistent" or "Session" Cookies. Persistent Cookies remain on your personal computer or mobile device when You go offline, while Session Cookies are deleted as soon as You close your web browser. Learn more about cookies: [All About Cookies](#).

We use both session and persistent Cookies for the purposes set out below:

Necessary / Essential Cookies

Type: Session Cookies

Administered by: Us

Purpose: These Cookies are essential to provide You with services available through the Website and to enable You to use some of its features. They help to authenticate users and prevent fraudulent use of user accounts. Without these Cookies, the services that You have asked for cannot be provided, and We only use these Cookies to provide You with those services.

Cookies Policy / Notice Acceptance Cookies

Type: Persistent Cookies

Administered by: Us

Purpose: These Cookies identify if users have accepted the use of cookies on the Website.

Functionality Cookies

Type: Persistent Cookies

Administered by: Us

Purpose: These Cookies allow us to remember choices You make when You use the Website, such as remembering your login details or language preference. The

purpose of these Cookies is to provide You with a more personal experience and to avoid You having to re-enter your preferences every time You use the Website.

For more information about the cookies we use and your choices regarding cookies, please visit our Cookies Policy or the Cookies section of our Privacy Policy.

How We Collect Information

We collect Personal Data:

- Directly from you when you become a shareholder, contact us, or use our website
- From issuer companies when setting up or updating shareholder records
- Automatically through website cookies and tracking technologies
- From third parties such as banks, brokers, other transfer agents, or regulatory databases
- Through transactions when you buy, sell, or transfer shares

Use of Your Personal Data

The Company may use Personal Data for the following purposes:

- **To provide and maintain our Service**, including to monitor the usage of our Service.
- **To manage Your Account:** to manage Your registration as a user of the Service. The Personal Data You provide can give You access to different functionalities of the Service that are available to You as a registered user.
- **To perform under a shareholder services agreement with an issuer:** We use the collected Personal Data in our capacity as a stock transfer agent for our issuer clients. Specifically, we use this information to:
 - Maintain the master securityholder file for our issuer clients
 - Process dividend payments (if applicable)
 - Contact You as instructed by our issuer clients
 - Respond to Your inquiries
 - Comply with SEC regulations for record-keeping purposes
 - Comply with state regulations for unclaimed property compliance
- **To contact You:** To contact You by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding updates or informative communications related to the functionalities, products or contracted services, including the security updates, when necessary or reasonable for their implementation.
- **To manage Your requests:** To attend and manage Your requests to Us.
- **To maintain legal and regulatory compliance:**

- Comply with federal and state securities regulations
- Meet SEC recordkeeping and reporting requirements
- Respond to legal processes and government requests
- Prevent fraud and ensure account security
- Conduct required identity verification

How We Share Your Personal Information

We Do Not Sell Your Personal Information

ClearTrust does not sell, rent, or trade Your personal information to third parties for monetary consideration.

Permitted Information Sharing

We may share Your personal information in the following circumstances:

With Issuer Companies:

- Share shareholder information with the companies whose stock You own for corporate governance, communication, and regulatory compliance purposes

With Service Providers:

- Payment processors (Stripe, WePay, PayPal) for fee payments
- Mail and printing services for sending statements and documents
- Technology service providers for data processing and website hosting
- Legal and professional service providers for compliance and audit purposes

For Legal and Regulatory Requirements:

Government agencies and regulators as required by law

- Law enforcement in response to valid legal processes
- Courts and legal proceedings when required by subpoena or court order

For Business Operations:

- Successor transfer agents when we cease serving an issuer
- In connection with business transfers, mergers, or acquisitions
- To protect our rights, property, or safety, or that of our users

With Your Consent:

- Any other sharing You specifically authorize or request

Our Information Security Program

We maintain a comprehensive written information security program designed to protect Your personal information through multiple layers of security:

Administrative Safeguards

- Employee background checks and security training
- Access controls based on job responsibilities and least privilege principles
- Clean desk policies and secure document handling procedures
- Regular security awareness training and policy updates
- Incident response procedures and breach notification protocols

Technical Safeguards

- Network firewalls and intrusion detection/prevention systems
- Multi-factor authentication and strong password requirements
- Data encryption for information in transit and at rest
- Regular vulnerability scanning and security assessments
- Endpoint protection and anti-malware software
- Secure email systems and encrypted file sharing

Physical Safeguards

- Secured facilities with controlled access and visitor management
- Locked file cabinets and secure document storage
- 24/7 video surveillance and monitoring systems
- Secure disposal of physical documents through certified destruction
- Environmental controls and disaster recovery procedures

Ongoing Security Measures

- Annual risk assessments and security program reviews
- Regular testing and monitoring of security controls
- Continuous security monitoring through third-party services
- Vendor security assessments and contract requirements
- Employee security training and compliance monitoring

Data Breach Notification

In the event of a security incident that compromises Your personal information, we will:

- **Investigate and contain** the incident immediately
- **Notify affected customers** as soon as possible, but no later than 30 days after discovery
- **Provide detailed information** about what happened, what information was involved, and steps we are taking to address the situation
- **Offer recommendations** for steps You can take to protect Yourself
- **Notify regulatory authorities** including the SEC as required by law
- **Provide ongoing updates** as the investigation progresses

Notifications will include contact information for consumer reporting agencies and relevant regulatory authorities.

Retention of Your Personal Data

The Company retain shareholder details for the entire duration of Our Service as transfer agent for a given issuer client. Upon ceasing to be the transfer agent, We follow the issuer's instructions to deliver the shareholder records, which may include Your Personal Data, to the successor transfer agent or back to the issuer. We then purge this data from Our system.

However, we permanently retain Our emails. If shareholder data is sent to Us by email, We will retain that information as part of Our email retention policy. We adhere to the SEC's recordkeeping and data retention rules for transfer agents.

We will retain Your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use Your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

The Company will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of Our Service, or We are legally obligated to retain this data for longer time periods.

Transfer of Your Personal Data

Your information, including Personal Data, is processed at the Company's operating offices and in any other places where the parties involved in the processing are located. It means that this information may be transferred to — and maintained on — computers located outside of Your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from Your jurisdiction.

Your consent to this Privacy Policy followed by Your submission of such information represents Your agreement to that transfer.

The Company will take all steps reasonably necessary to ensure that Your data is treated securely and in accordance with this Privacy Policy and no transfer of Your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of Your data and other personal information.

Disclosure of Your Personal Data

Business Transactions

If the Company is involved in a merger, acquisition or asset sale, Your Personal Data may be transferred. We will provide notice before Your Personal Data is transferred and becomes subject to a different Privacy Policy.

Law enforcement

Under certain circumstances, the Company may be required to disclose Your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

Other legal requirements

The Company may disclose Your Personal Data in the good faith belief that such action is necessary to:

- Comply with a legal obligation
- Protect and defend the rights or property of the Company
- Prevent or investigate possible wrongdoing in connection with the Service
- Protect the personal safety of Users of the Service or the public
- Protect against legal liability

Security of Your Personal Data

The security of Your Personal Data is important to Us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While We

strive to use commercially acceptable means to protect Your Personal Data, We cannot guarantee its absolute security.

Detailed Information on the Processing of Your Personal Data

Service Providers have access to Your Personal Data only to perform certain defined tasks on Our behalf and are obligated not to disclose or use it for any other purpose.

Email Marketing

We may use Your Personal Data to contact You with newsletters, marketing or promotional materials and other information that may be of interest to You. You may opt-out of receiving any, or all, of these communications from Us by following the unsubscribe link or instructions provided in any email We send or by contacting Us.

We may use Email Marketing Service Providers to manage and send emails to You.

Payments

We may provide paid products and/or services within the Service. In that case, we may use third-party services for payment processing (e.g. payment processors).

We will not store or collect Your payment card details. That information is provided directly to Our third-party payment processors whose use of Your personal information is governed by their Privacy Policy. These payment processors adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, Mastercard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of payment information.

Stripe

Their Privacy Policy can be viewed at <https://stripe.com/us/privacy>

WePay

Their Privacy Policy can be viewed at <https://go.wepay.com/privacy-policy>

PayPal

Their Privacy Policy can be viewed at

<https://www.paypal.com/webapps/mpp/ua/privacy-full>

When You use Our Service to pay a product and/or service via bank transfer, We may ask You to provide information to facilitate this transaction and to verify Your identity.

Privacy Notice Delivery

How You Receive Privacy Notices

We provide privacy notices:

- **Initially** when you first become our customer
- **Annually** (unless we qualify for alternative delivery method)
- **When revised** if we make material changes to our privacy practices

Delivery Methods

You may receive privacy notices:

- **Electronically** if you have consented to electronic delivery
- **By mail** if you request delivery by mail
- **Through our website** with notification in regular account communications

Electronic Delivery

You may access this privacy notice electronically by clicking on the link called “Our Privacy Disclosure Policy” on the home page of Our website: www.cleartrustonline.com or by requesting the notice via secure email. You can request a printed copy at any time and may withdraw consent for electronic delivery.

Changes to This Privacy Notice

We may update this Privacy Notice periodically to reflect changes in our practices or applicable laws. We will:

- Post the updated notice on our website
- Notify you via email and/or prominent notice before changes take effect
- Update the effective date at the top of this notice
- Provide revised notices to customers as required by Regulation S-P

GDPR Privacy

Legal Basis for Processing Personal Data under GDPR

We may process Personal Data under the following conditions:

- **Consent:** You have given Your consent for processing Personal Data for one or more specific purposes.
- **Performance of a contract:** Provision of Personal Data is necessary for the performance of an agreement with You and/or for any pre-contractual obligations thereof.
- **Legal obligations:** Processing Personal Data is necessary for compliance with a legal obligation to which the Company is subject.

- **Vital interests:** Processing Personal Data is necessary in order to protect Your vital interests or of another natural person.
- **Public interests:** Processing Personal Data is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Company.
- **Legitimate interests:** Processing Personal Data is necessary for the purposes of the legitimate interests pursued by the Company.

In any case, the Company will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

Your Rights under the GDPR

The Company undertakes to respect the confidentiality of Your Personal Data and to guarantee You can exercise Your rights.

You have the right under this Privacy Policy, and by law if You are within the EU, to:

- **Request access to Your Personal Data.** The right to access, update or delete the information We have on You. Whenever made possible, you can access, update or request deletion of Your Personal Data directly within Your account settings section. If you are unable to perform these actions yourself, please contact Us to assist You. This also enables You to receive a copy of the Personal Data We hold about You.
- **Request correction of the Personal Data that We hold about You.** You have the right to have any incomplete or inaccurate information We hold about You corrected.
- **Object to processing of Your Personal Data.** This right exists where We are relying on a legitimate interest as the legal basis for Our processing and there is something about Your particular situation, which makes You want to object to our processing of Your Personal Data on this ground. You also have the right to object where We are processing Your Personal Data for direct marketing purposes.
- **Request erasure of Your Personal Data.** You have the right to ask Us to delete or remove Personal Data when there is no good reason for Us to continue processing it.
- **Request the transfer of Your Personal Data.** We will provide to You, or to a third-party You have chosen, Your Personal Data in a structured, commonly used, machine-readable format. Please note that this right only applies to automated information which You initially provided consent for Us to use or where We used the information to perform a contract with You.
- **Withdraw Your consent.** You have the right to withdraw Your consent on using your Personal Data. If You withdraw Your consent, We may not be able to provide You with access to certain specific functionalities of the Service.

Exercising of Your GDPR Data Protection Rights

You may exercise Your rights of access, rectification, cancellation and opposition by contacting Us. Please note that we may ask You to verify Your identity before responding to such requests. If You make a request, We will try our best to respond to You as soon as possible.

You have the right to complain to a Data Protection Authority about Our collection and use of Your Personal Data. For more information, if You are in the European Economic Area (EEA), please contact Your local data protection authority in the EEA.

CCPA Privacy

Your Rights under the CCPA

Under this Privacy Policy, and by law if You are a resident of California, You have the following rights:

- **The right to notice.** You must be properly notified which categories of Personal Data are being collected and the purposes for which the Personal Data is being used.
- **The right to access / the right to request.** The CCPA permits You to request and obtain from the Company information regarding the disclosure of Your Personal Data that has been collected in the past 12 months by the Company or its subsidiaries to a third-party for the third party's direct marketing purposes.
- **The right to say no to the sale of Personal Data.** You also have the right to ask the Company not to sell Your Personal Data to third parties. The Company does not sell Your Personal Data.
- **The right to know about Your Personal Data.** You have the right to request and obtain from the Company information regarding the disclosure of the following:
 - The categories of Personal Data collected
 - The sources from which the Personal Data was collected
 - The business or commercial purpose for collecting or selling the Personal Data
 - Categories of third parties with whom We share Personal Data
 - The specific pieces of Personal Data we collected about You
- **The right to delete Personal Data.** You also have the right to request the deletion of Your Personal Data that have been collected in the past 12 months, subject to certain limitations. We will honor your request to the extent permitted by federal and state financial regulations.
- **The right not to be discriminated against.** You have the right not to be discriminated against for exercising any of Your Consumer's rights, including by:

- Denying goods or services to You
- Charging different prices or rates for goods or services, including the use of discounts or other benefits or imposing penalties
- Providing a different level or quality of goods or services to You
- Suggesting that You will receive a different price or rate for goods or services or a different level or quality of goods or services.

Exercising Your CCPA Data Protection Rights

In order to exercise any of Your rights under the CCPA, and if you are a California resident, You can email or call us or visit our "Do Not Sell My Personal Information" section or web page.

The Company will disclose and deliver the required information free of charge within 45 days of receiving Your verifiable request. The time period to provide the required information may be extended once by an additional 45 days when reasonable necessary and with prior notice.

Do Not Sell My Personal Information

We do not sell personal information.

"Do Not Track" Policy as Required by California Online Privacy Protection Act (CalOPPA)

Our Service does not respond to Do Not Track signals.

However, some third party websites do keep track of Your browsing activities. If You are visiting such websites, You can set Your preferences in Your web browser to inform websites that You do not want to be tracked. You can enable or disable DNT by visiting the preferences or settings page of Your web browser.

Your California Privacy Rights (California's Shine the Light law)

Under California Civil Code Section 1798 (California's Shine the Light law), California residents with an established business relationship with us can request information once a year about sharing their Personal Data with third parties for the third parties' direct marketing purposes.

If you'd like to request more information under the California Shine the Light law, and if you are a California resident, You can contact Us using the contact information provided below.

California Privacy Rights for Minor Users (California Business and Professions Code Section 22581)

California Business and Professions Code section 22581 allow California residents under the age of 18 who are registered users of online sites, services or applications to request and obtain removal of content or information they have publicly posted.

To request removal of such data, and if you are a California resident, You can contact Us using the contact information provided below, and include the email address associated with Your account.

Be aware that Your request does not guarantee complete or comprehensive removal of content or information posted online and that the law may not permit or require removal in certain circumstances.

Links to Other Websites

Our Service may contain links to other websites that are not operated by Us. If You click on a third party link, You will be directed to that third party's site. We strongly advise You to review the Privacy Policy of every site You visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

Changes to this Privacy Policy

We may update our Privacy Policy from time to time. We will notify You of any changes by posting the new Privacy Policy on this page.

We will let You know via email and/or a prominent notice on Our Service, prior to the change becoming effective and update the "Last updated" date at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

Contact Information

If you have any questions about this Privacy Policy, You can contact us:

- By email: inbox@cleartrusttransfer.com
- By phone: 813.235.4490

- You may also contact us by mail at our official business address, available at www.cleartrustonline.com/contact.

Regulatory Authorities

Securities and Exchange Commission (SEC)

Transfer Agent Regulation

100 F Street, NE

Washington, DC 20549

Phone: (202) 551-6551

Website: www.sec.gov

California Attorney General

CCPA Enforcement

Privacy Enforcement

300 South Spring Street

Los Angeles, CA 90013

Website: oag.ca.gov/privacy/ccpa

European Data Protection Authorities

GDPR Complaints

Contact your local data protection authority in the European Economic Area (EEA)

This Privacy Notice is effective as of the date listed above and supersedes all previous versions.