Banquo Financial Services
Privacy Policy

Document Control

a.	**Document Title**	Privacy Policy
b.	**Date of Release**	November 2026
c.	**Version No.**	Version 1.1
d.	**Document Owner**	Chief Compliance Officer (CCO)
e.	**Document Classification**	Internal Use Only

Document Approvers

S. No.	Name	Date of Approval	Designation
1.	Board of Directors	November 2026	Final Approval
2.	Chief Compliance Officer	November 2026	Policy Owner

Document Review History

Rev No.	Date of Revision	Description of change	Reviewed and Approved by	Next Review
1	April 24th 2026	Policy Introduction	Sejal Patel	April 2027
2	November 2026	Policy Revision	Sejal Patel	November 2027

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1. Purpose

Jans Financial Services Inc. doing business as (d/b/a) Banquo Financial Services ("Banquo" or the "Company") establishes this Privacy Policy (the "Policy") to define the framework for the collection, use, sharing, and protection of customer information. Banquo is committed to safeguarding personal and financial information and complying with applicable privacy, data protection, and cybersecurity requirements.

This Policy is designed to ensure compliance with:

- Gramm-Leach-Bliley Act
- Regulation P
- FTC Safeguards Rule
- Applicable U.S. state privacy laws
- NIST Cybersecurity Framework (as a guiding standard)

This Policy also supports Banquo's obligations to provide clear and accurate privacy disclosures to customers, including the delivery of a Privacy Notice as required under applicable law.

2. Scope

This Policy applies to all personal information collected, processed, stored, or shared by Banquo in connection with its products and services.

Banquo's customer base includes primarily non-U.S. individuals and related Personal Investment Companies (PICs). Banquo maintains responsibility for onboarding, identity verification, and customer due diligence within its controlled customer experience.

This Policy applies to:

- All employees, contractors, and personnel
- All systems and processes handling personal information
- All third parties processing data on behalf of Banquo

This Policy applies to information collected and processed in connection with Banquo's products and services offered in coordination with its Sponsor Bank and financial partners.

3. Definitions

Personal Information – Any information that identifies or can reasonably be linked to an identifiable individual, including financial and account information.

Nonpublic Personal Information (NPI) – Personally identifiable financial information provided by a consumer to obtain a financial product or service, or resulting from a transaction.

Service Provider – A third party that processes personal information on behalf of Banquo.

Customer – Any individual or entity that obtains or seeks to obtain a financial product or service from Banquo.

Privacy Notice – A customer-facing disclosure that describes Banquo's information collection, use, sharing practices, and customer rights, provided in accordance with the Gramm-Leach-Bliley Act and Regulation P.

4. Information Collection and Use

Banquo collects personal information necessary to:

- Establish and maintain customer relationships
- Conduct identity verification and due diligence
- Provide and service financial products
- Meet legal and regulatory obligations

Information collected may include:

- Identifying information (e.g., name, address, date of birth)
- Financial and transactional data
- Account and payment activity

Banquo uses this information solely for legitimate business and compliance purposes and does not use it in a manner inconsistent with customer expectations or regulatory requirements, unless otherwise permitted or required by law.

Banquo applies data minimization principles and retains personal information only for as long as necessary to fulfill business and regulatory purposes.

5. Information Sharing

Banquo may share personal information as permitted by law, including:

- With Sponsor Banks and financial partners
- With service providers performing functions on Banquo's behalf
- To comply with legal or regulatory obligations

Banquo does not sell customer personal information.

Information sharing with Sponsor Banks is conducted as necessary to facilitate account services, regulatory compliance, and program oversight.

Where required under applicable law, Banquo provides customers with a Privacy Notice describing its information sharing practices and, where applicable, the ability to opt out of certain types of information sharing. Such disclosures are provided in accordance with Regulation P requirements.

6. Data Protection and Security

Banquo maintains administrative, technical, and physical safeguards designed to protect personal information.

These safeguards include:

- Access controls and authentication mechanisms
- Encryption and secure data transmission
- Monitoring and incident detection systems

Banquo aligns its information security program with the FTC Safeguards Rule and industry frameworks such as NIST. Banquo's information security program includes risk assessments, control design and testing, and ongoing monitoring consistent with the requirements of the FTC Safeguards Rule.

7. Incident Response and Breach Notification

Banquo maintains an incident response program to detect, respond to, and mitigate data security incidents.

Where required, Banquo will:

- Notify affected individuals
- Notify regulators and Sponsor Banks
- Take appropriate remediation actions

Banquo coordinates with its Sponsor Bank and relevant third parties in the event of a security incident, where required for regulatory reporting or customer notification.

8. Digital Disclosures and Consent

Banquo complies with:

- Electronic Signatures in Global and National Commerce Act (E-SIGN)
- Uniform Electronic Transactions Act (UETA)

Customers may receive disclosures electronically where consent is obtained and records are maintained.

9. Customer Rights

Banquo recognizes that customers may have rights under applicable privacy and data protection laws. These rights may include:

- Access to personal information
- Correction of inaccurate information
- Requests related to data use or sharing

Banquo maintains processes to receive, verify, and respond to such requests in accordance with applicable legal and regulatory requirements.

Where applicable, Banquo will provide information regarding how customers may exercise their rights through its Privacy Notice or other customer communications.

10. Privacy Notice and Customer Disclosures

Banquo provides customers with a Privacy Notice that describes its information collection, use, and sharing practices, as well as customer rights, in accordance with the Gramm-Leach-Bliley Act and Regulation P.

The Privacy Notice is provided at onboarding and, where required, on an ongoing basis. Banquo ensures that such disclosures are clear, accurate, and accessible to customers.

11. Training and Governance

Banquo provides training to employees regarding privacy and data protection obligations and maintains oversight through its Compliance function.

The Chief Compliance Officer is responsible for oversight of this Policy and for ensuring alignment with Banquo's broader Compliance Management System and applicable regulatory requirements.

12. Record Retention

Personal information is retained only as long as necessary to:

- Fulfill business purposes
- Meet regulatory requirements

Records must be maintained in a manner sufficient to demonstrate compliance with applicable privacy laws, regulatory expectations, and Sponsor Bank oversight requirements.

13. Exceptions

Any exceptions must be approved by the Chief Compliance Officer and must not violate applicable law.