

Version 1.

Rev. 08/24/2024

PRIVACY POLICY

This Privacy Policy regarding Personal Information of Users and Clients ("Privacy Policies") applies to Plutus21 Capital Management, L.L.C. (Plutus21, "we," "us," or "our") and governs the collection, use, and protection of Personal Information from our clients, website visitors, and online individuals ("you" or "your"). This Privacy Policy outlines our commitment to safeguarding your privacy and describes how we handle Personal Information and other data collected during your interactions with our website.

Please note that this Privacy Policy applies specifically to Plutus21 and does not extend to subsidiaries or affiliates of Plutus21 that may have their own distinct privacy policies. Additionally, this Privacy Policy does not cover the privacy practices of our business partners or any third-party websites, even if linked to or accessible from our website. We encourage you to review the privacy policies of these entities for information regarding their data practices.

Please review this information thoroughly before accessing our platforms or utilizing our services. By accessing our platforms, creating an account, or using our services, you are consenting to the terms outlined in this Privacy Policy.

WHAT INFORMATION DO WE COLLECT?

General Contact Information

We collect personal information that you voluntarily share with us. This occurs when you register for our Services, express interest in learning more about our company or products, participate in Services-related activities, or contact us directly. The specific types of personal information we collect depend on your interactions with us, your choices, and the products and features you use. This may include names, phone numbers, email addresses, mailing addresses, usernames, contact preferences, contact or authentication data and any information you provide in messages to us.

For Accounts

When you apply to open an account, you will need to set up a login and password. In addition to basic Contact Information, such as your date of birth and Social Security Number, we also collect a range of personal details. This includes educational background, gender, interests, a photo, country of birth and nationality, employment status, occupation, employer details, marital status, government ID numbers like passport or other identification, financial information such as bank accounts and payment cards, suitability and risk preferences, personal income sources, net worth, trusted contact information, account balances, credit scores, tax information, and other pertinent financial details. Upon approval of your application, you will engage in an Investment Advisory Agreement and other contractual agreements with Plutus21 that govern the management of your account.

Automatically Collected Information

When you use our Service, we automatically gather details about your device and how you interact with us. This includes your Internet Service Provider (ISP), IP Address, the website that led you to us, the pages you visit on our Service in sequence, the timing and duration of your visits, and other statistical data. We also collect aggregated demographic information about users, such as age, gender, and income.

To enhance your experience, we use technologies like cookies and web beacons. These tools can identify your device, remember your preferences, track your journey through our pages, and help us understand usage patterns. While cookies and web beacons do not contain personally identifiable information by themselves, any such information you provide may be linked to the data stored by these technologies. We may also allow selected third parties to place cookies on our Service for analytics, demographics, or targeted advertising purposes, which may track your activities across different websites over time. You can typically disable cookies through your browser settings or delete persistent cookies, but this might affect certain functionalities of our Service.

HOW DO WE COLLECT AND PROCESS YOUR INFORMATION?

We gather and generate personal information through various channels and sources, depending on the product or service and our relationship with you. Here are some ways we may collect or generate personal information:

1. **Direct Interaction:** You directly provide us with personal information or authorize us to obtain it from third parties.
2. **Business Relationships:** Information about personnel (including yourself) is supplied by businesses in connection with their interactions with us. Companies seeking to use our services also provide information about their personnel during due diligence or application processes.
3. **Online and Service Usage:** When you visit our website or utilize our services, we collect relevant information.
4. **Communication Channels:** Information is gathered when you communicate with us via email, phone, mail, social media platforms, your account profile, or other means. Telephone calls may be recorded and monitored, including the incoming phone number.

5. Financial Transactions: Personal information is documented when customers send or receive payments, such as authorizing transactions on behalf of a business or being listed as a contact person. Information is also obtained from other banks involved in processing payments to and from accounts not affiliated with Plutus21
6. Third-Party Verification: To verify your identity and assess risk, we may request personal information from third parties. This includes fraud prevention agencies and identity verification service providers, which may acquire data from additional sources.
7. Government Sanctions and Regulatory Information: Additionally, we check government sanction lists and conduct searches on representatives, payees, or other affiliated parties of the account holder or representative.
8. Information from Regulators and Law Enforcement: We may also receive personal information from regulators or law enforcement agencies regarding you. This could occur, for example, during your account application process, when conducting business with us on behalf of a company, representing a corporate account holder, making or receiving payments involving a Plutus21 account, or when investigating fraudulent or suspicious activities.

WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?

With our affiliates: Personal information may be shared with other entities within Plutus21 to facilitate our services, manage accounts, enhance service quality, or as permitted by relevant laws and regulations.

With vendors: Personal information may be disclosed to external companies that provide support services, including data analytics, fraud prevention, identity verification, risk assessment, security services, advertising, marketing, customer support, mail handling, email delivery, IT services, payment processing, and other service providers and business partners.

To comply with legal obligations: We reserve the right to disclose information to third parties as permitted by law or as necessary to comply with legal obligations. This may include responding to legal processes such as subpoenas, safeguarding against fraudulent activities, and cooperating with law enforcement or regulatory authorities. Additionally, we may disclose information if we believe it is essential to protect our rights, property, or safety, or that of our employees, customers, business partners, or any other individuals, or to enforce our contractual agreements.

Corporate Changes: In the event of significant corporate events such as mergers, acquisitions, restructurings, dissolutions, or the sale or transfer of assets or liabilities, some of the personal information we hold may be transferred as part of such transactions to a buyer or successor. We may also share personal information with another entity, its affiliates, or service providers during negotiations or in connection with mergers, acquisitions, asset sales, changes in ownership, or financing activities.

Other Authorized Disclosures: Personal information may also be disclosed to others as permitted under applicable laws and regulations, or with your consent or direction. Additionally, we may utilize and disclose information collected in aggregate, de-identified, or anonymous forms for various business purposes, where permissible under applicable laws and regulations.

HOW LONG DO WE KEEP YOUR INFORMATION?

We will retain your information for at least as long as necessary to fulfill the purposes for which it was collected or as authorized by you. Additionally, we will retain and use your information to comply with legal obligations, resolve disputes, enforce agreements, and meet tax, accounting, or other legal requirements that may necessitate longer retention periods. When your personal information no longer serves an ongoing legitimate business need, we will either delete or anonymize it. If deletion is not immediately possible (e.g., due to storage in backup archives), we will securely store your information and prevent further processing until deletion becomes feasible.

HOW DO WE KEEP YOUR INFORMATION SAFE?

We have implemented reasonable technical and organizational security measures to safeguard the processing of any personal information. However, despite our efforts, no electronic transmission over the Internet or information storage technology can be ensured to be 100% secure. Therefore, we cannot guarantee immunity against potential actions by hackers, cybercriminals, or unauthorized third parties who may attempt to bypass our security measures and improperly collect, access, steal, or modify your information. While we strive to protect your personal information to the best of our ability, the transmission of such information to and from our Services is inherently at your own risk. It is advisable to access the Services only within a secure environment.

Furthermore, it's crucial for clients to actively manage and access their account information. You must regularly review your account statements and other documents, utilize our phone services, and log in securely to our website. For specific inquiries, clients are responsible for contacting us via mail or phone using the addresses and numbers provided on their Plutus21 correspondence.

You also have a responsibility to protect your personal information. Please refrain from sharing your username or password with others. If we receive an order or instructions using your information, we will interpret this as authorization for the transaction.

DO WE COLLECT INFORMATION FROM MINORS?

We do not knowingly solicit data from or market to children under 18 years of age. By using the Services, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Services. If we

learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we may have collected from children under age 18, please contact us at through our contact page.

YOUR RIGHT TO OPT-OUT

You have the right to opt out of the sharing of your personal information with non-affiliated third parties. If you choose to exercise this right, please notify us at contact@plutus21.com. Upon receiving your request, we will ensure that your preferences are implemented and that your information will not be shared with these non-affiliates, in accordance with applicable regulations.

INTERNATIONAL USERS

Accessibility for International Users

Our Service and its servers operate within the United States. If you reside outside the United States, please note that any information you share with us will be transferred to the United States, where privacy laws may differ from those in your home country. By opting to use our Service from outside the United States, you acknowledge and accept any associated risks.

CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ("DNT") feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will update this Privacy Policy.

DO WE MAKE UPDATES TO THIS NOTICE?

We may update this privacy notice periodically. The revised version will be marked with an updated 'Revised' date and will take effect as soon as it is accessible. While we may not notify you of every change, it is your responsibility to regularly review this Privacy Policy to understand how we safeguard your information and any updates that may affect you.

13. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?

If you have questions or comments about this notice, you may email us at contact@plutus21.com or contact us by post at:

Plutus21 Capital
200 Crescent Court
Suit 1430, Dallas, Texas,
75201, United States.