# **Privacy Policy**

Effective as of September 15, 2025

**California residents**: If you are a California resident, please see the **Notice to California residents** section below in addition to this Privacy Policy for information about your personal information and privacy rights.

This Privacy Policy describes how New Blueprint Partners, LLC ("New Blueprint Partners," "we," "us," or "our") processes personal information that we collect through our digital or online properties or services that link to this Privacy Policy (including as applicable, our website, social media pages, marketing activities, live events and other activities described in this Privacy Policy (collectively, the "Service")). By accessing and using this Website, you agree to be bound by this Privacy Policy in its entirety. If you do not agree with the terms of this Privacy Policy, please do not use our Site.

Information we collect from customers who have created an account for purposes of seeking financial products or services from us to be used primarily for personal, family or household purposes is also subject to New Blueprint Partners' **GLBA Notice**, available here. To the extent this Privacy Policy conflicts with our GLBA Notice, our GLBA Notice shall apply.

New Blueprint Partners may provide additional or supplemental privacy policies to individuals for specific products or services that we offer at the time we collect personal information.

### Personal information we collect

**Information you provide to us**. Personal information you may provide to us through the Service or otherwise includes:

- **Contact data**, such as your first and last name, salutation, email address, billing and mailing addresses, professional title or occupation, company name, and phone number.
- **Demographic data**, such as your city, state, country of residence, postal code, and age.
- Profile data, such as the username and password that you may set to establish
  an online account on the Service, date of birth, redemption code, biographical
  details, photograph or picture, interests, preferences, and any other information
  that you add to your account profile.
- User-generated content data, such as comments, questions, messages, documents, and other content or information that you generate, transmit, or otherwise make available on the Service, as well as associated metadata. Metadata includes information on how, when, where and by whom a piece of

content was collected and how that content has been formatted or edited. Metadata also includes information that users can add or can have added to their content, such as keywords, geographical or location information, and other similar data.

- **Investment data**, such as stated income level, return expectations, net worth, portfolio size, investment experience, desired investment term, risk tolerance, and areas of investment interest.
- **Financial data**, such as your financial account numbers, bank routing numbers, or payment card information.
- **Transactional data**, such as information relating to or needed to complete your orders on or through the Service, including order numbers and transaction history.
- **Identity verification data**, such as tax identification number, your driver's license or government-issued identification number or card.
- Communications data based on our exchanges with you, including when you contact us through the Service or communicate with us via email, social media, or otherwise.
- **Marketing data**, such as your preferences for receiving our marketing communications and details about your engagement with them.
- Other data not specifically listed here, which we will use as described in this Privacy Policy or as otherwise disclosed at the time of collection.

**Third-party sources**. We may combine personal information we receive from you with personal information we obtain from other sources, such as:

- **Public sources**, such as government agencies, public records, social media platforms, and other publicly available sources.
- **Private sources**, such as data providers, social media platforms, financial partners and data licensors.
- Our affiliate partners, such as our affiliate network provider and publishers, influencers, and promoters who participate in our paid affiliate programs.
- Marketing partners, such as joint marketing partners and event co-sponsors.
- Third-party services, such as third-party services that you use to log into, or
  otherwise link to, your Service account. This data may include your username,
  profile picture and other information associated with your account on that
  third-party service that is made available to us based on your account settings on
  that service.

**Automatic data collection**. We, our service providers, and our business partners may automatically log information about you, your computer or mobile device, and your interaction over time with the Service, our communications and other online services, such as:

- Device data, such as your computer's operating system type and version, manufacturer and model, browser type, screen resolution, RAM and disk size, CPU usage, device type (e.g., phone, tablet), IP address, unique identifiers (including identifiers used for advertising purposes), language settings, mobile device carrier, radio/network information (e.g., Wi-Fi, LTE, 3G), and general location information such as city, state or geographic area.
- Online activity data, such as pages or screens you viewed, how long you spent
  on a page or screen, the website you visited before browsing to the Service,
  navigation paths between pages or screens, information about your activity on a
  page or screen, access times and duration of access, and whether you have
  opened our emails or clicked links within them.
- Communication interaction data such as your interactions with our email or other communications (e.g., whether you open and/or forward emails) – we may do this through use of pixel tags (which are also known as clear GIFs), which may be embedded invisibly in our emails.

**Cookies and other technologies**. Some of the automatic collection described above is facilitated by the following technologies:

- Cookies, which are small text files that websites store on user devices and that
  allow web servers to record users' web browsing activities and remember their
  submissions, preferences, and login status as they navigate a site. Cookies used
  on our sites include both "session cookies" that are deleted when a session ends,
  "persistent cookies" that remain longer, "first party" cookies that we may place
  and "third party" cookies that our third-party business partners and service
  providers place.
- Local storage technologies, like HTML5, that provide cookie-equivalent functionality but can store larger amounts of data on your device outside of your browser in connection with specific applications.
- Web beacons, also known as pixel tags or clear GIFs, which are used to demonstrate that a webpage or email was accessed or opened, or that certain content was viewed or clicked.

**Data about others**. We may offer features that help users invite their friends or contacts to use the Service, and we may collect contact details about these invitees so we can deliver their invitations. Please do not refer someone to us or share their contact details with us unless you have their permission to do so.

# How we use your personal information

We may use your personal information for the following purposes or as otherwise described at the time of collection:

**Service delivery and operations**. We may use your personal information to:

- provide, operate and improve the Service and our business;
- personalize the service, including remembering the devices from which you have previously logged in and remembering your selections and preferences as you navigate the Service;
- establish and maintain your user profile on the Service;
- enable security features of the Service, such as by sending you security codes via email or phone, and remembering devices from which you have previously logged in;
- communicate with you about the Service, including by sending Service-related announcements, updates, security alerts, and support and administrative messages;
- understand your needs and interests, and personalize your experience with the Service and our communications; and
- provide support for the Service, and respond to your requests, questions and feedback.

We may communicate with you via phone and email.

**Research and development**. We may use your personal information for research and development purposes, including to analyze and improve the Service and our business and to develop new products and services.

**Marketing and advertising**. We, our service providers and our third-party advertising partners may collect and use your personal information for marketing and advertising purposes:

- Direct marketing. We may send you direct marketing communications and may personalize these messages based on your needs and interests. You may opt-out of our marketing communications as described in the Opt-out of communications section below.
- Interest-based advertising. Our third-party advertising partners may use
  cookies and similar technologies to collect information about your interaction
  (including the data described in the automatic data collection section above) with
  the Service, our communications and other online services over time, and use
  that information to serve online ads that they think will interest you. This is called
  interest-based advertising. We may also share information about our users with
  these companies to facilitate interest-based advertising to those or similar users
  on other online platforms.

**Events**. We may use your personal information to:

- administer events;
- communicate with you about events in which you participate; and
- contact or market to you after collecting your personal information at an event.

**Service improvement and analytics**. We may use your personal information to analyze your usage of the Service, improve the Service, improve the rest of our business, help us understand user activity on the Service, including which pages are most and least visited and how visitors move around the Service, as well as user interactions with our emails, and to develop new products and services.

Compliance and protection. We may use your personal information to:

- comply with applicable laws (including without limitation identity verification, anti-money laundering, and sanctions laws), lawful requests, and legal process, such as to respond to subpoenas, investigations or requests from government authorities;
- protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims);
- audit our internal processes for compliance with legal and contractual requirements or our internal policies;
- enforce the terms and conditions that govern the Service; and
- prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks, identity theft, and money laundering.

To create aggregated, de-identified and/or anonymized data. We may create aggregated, de-identified and/or anonymized data from your personal information and other individuals whose personal information we collect. We make personal information into de-identified and/or anonymized data by removing information that makes the data identifiable to you. We may use this aggregated, de-identified and/or anonymized data and share it with third parties for our lawful business purposes, including to analyze and improve the Service and promote our business.

**Further uses**. In some cases, we may use your personal information for further uses, in which case we will ask for your consent to use of your personal information for those further purposes if they are not compatible with the initial purpose for which information was collected.

### Retention

We generally retain personal information to fulfill the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements, to establish or defend legal claims, or for fraud prevention purposes. To determine the appropriate retention period for personal information, we may consider factors such as the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements. When we no longer require the personal information we have collected about you, we may either delete it, anonymize it, or isolate it from further processing.

## How we share your personal information

We may share your personal information with the following parties and as otherwise described in this Privacy Policy, in other applicable notices, or at the time of collection.

**Affiliates**. Our corporate parent, subsidiaries, and affiliates.

**Service providers**. Third parties that provide services on our behalf or help us operate the Service or our business (such as hosting, information technology, customer support, email delivery, marketing, consumer research and website analytics).

**Identity verification service providers**. Third parties that may provide services on our behalf to help us verify your identity.

**Financial partners**. We may share your personal information with our financial banking partners. These parties may use your personal information in accordance with their respective privacy policies.

**Business and marketing partners**. Third parties with whom we co-sponsor events, with whom we jointly offer products or services, or whose products or services may be of interest to you.

**Linked third-party services**. If you log into the Service with, or otherwise link your Service account to, a third-party service, we may share your personal information with that third-party service. The third party's use of the shared information will be governed by its privacy policy and the settings associated with your account with the third-party service.

**Professional advisors**. Professional advisors, such as lawyers, auditors, bankers and insurers, where necessary in the course of the professional services that they render to us.

**Authorities and others**. Law enforcement, government authorities, and private parties, as we believe in good faith to be necessary or appropriate for the Compliance and protection purposes described above.

**Business transferees**. We may disclose personal information in the context of actual or prospective business transactions (e.g., investments in New Blueprint Partners, financing of New Blueprint Partners, or the sale, transfer or merger of all or part of our business, assets or shares), for example, we may need to share certain personal information with prospective counterparties and their advisers. We may also disclose your personal information to an acquirer, successor, or assignee of New Blueprint Partners as part of any merger, acquisition, sale of assets, or similar transaction, and/or in the event of an insolvency, bankruptcy, or receivership in which personal information is transferred to one or more third parties as one of our business assets.

### Your choices

In this section, we describe the rights and choices available to all users. Users who are located in California can find additional information about their rights below.

Access or update your information. If you have registered for an account with us through the Service, you may review and update certain account information by logging into the account.

**Opt-out of communications**. You may opt-out of marketing-related emails by following the opt-out or unsubscribe instructions at the bottom of the email, or by contacting us. Please note that if you choose to opt-out of marketing-related emails, you may continue to receive service-related and other non-marketing emails.

**Cookies**. Most browsers let you remove or reject cookies. To do this, follow the instructions in your browser settings. Many browsers accept cookies by default until you change your settings. Please note that if you set your browser to disable cookies, the Service may not work properly. For more information about cookies, including how to see what cookies have been set on your browser and how to manage and delete them, visit <a href="www.allaboutcookies.org">www.allaboutcookies.org</a>. You can also configure your device to prevent images from loading to prevent web beacons from functioning.

**Blocking images/clear gifs**: Most browsers and devices allow you to configure your device to prevent images from loading. To do this, follow the instructions in your particular browser or device settings.

**Advertising choices**. You may be able to limit use of your information for interest-based advertising through the following settings/options/tools:

- **Browser settings**. Changing your internet web browser settings to block third-party cookies.
- Privacy browsers/plug-ins. Using privacy browsers and/or ad-blocking browser plug-ins that let you block tracking technologies.
- **Platform settings**. Google and Facebook offer opt-out features that let you opt-out of use of your information for interest-based advertising. You may be able to exercise that option at the following websites:
  - Google: <a href="https://adssettings.google.com/">https://adssettings.google.com/</a>
  - Facebook: <a href="https://www.facebook.com/about/ads">https://www.facebook.com/about/ads</a>
- Ad industry tools. Opting out of interest-based ads from companies that participate in the following industry opt-out programs:
  - Network Advertising Initiative:
     http://www.networkadvertising.org/managing/opt out.asp
  - Digital Advertising Alliance: optout.aboutads.info

You will need to apply these opt-out settings on each device and browser from which you wish to limit the use of your information for interest-based advertising purposes. We cannot offer any assurances as to whether the companies we work with participate in the opt-out programs described above.

**Do Not Track**. Some Internet browsers may be configured to send "Do Not Track" signals to the online services that you visit. We currently do not respond to "Do Not Track" signals. To find out more about "Do Not Track," please visit <a href="http://www.allaboutdnt.com">http://www.allaboutdnt.com</a>.

**Declining to provide information**. We need to collect personal information to provide certain services. If you do not provide the information we identify as required or mandatory, we may not be able to provide those services.

**Linked third-party platforms**. If you choose to connect to the Service through a third-party platform, you may be able to use your settings in your account with that platform to limit the information we receive from it. If you revoke our ability to access information from a third-party platform, that choice will not apply to information that we have already received from that third party.

**Delete your content or close your account**. You can choose to delete certain content through your account. If you wish to request to close your account, please contact us.

### Other sites and services

The Service may contain links to websites, mobile applications, and other online services operated by third parties. In addition, our content may be integrated into web pages or other online services that are not associated with us. These links and integrations are not an endorsement of the content contained on such websites, mobile applications or online services, or a representation that we are affiliated with, any third party. We do not control websites, mobile applications or online services operated by third parties, and we are not responsible for their actions. We encourage you to read the privacy policies of the other websites, mobile applications and online services you use.

# **Security**

We employ technical, organizational and physical safeguards designed to protect the personal information we collect. However, security risk is inherent in all internet and information technologies, and we cannot guarantee the security of your personal information.

#### International data transfer

We are headquartered in the United States and may use service providers that operate in other countries. Your personal information may be transferred to the United States or

other locations where privacy laws may not be as protective as those in your state, province, or country.

#### Children

The Service is not intended for use by anyone under 18 years of age. If you are a parent or guardian of a child from whom you believe we have collected personal information in a manner prohibited by law, please contact us. If we learn that we have collected personal information through the Service from a child without the consent of the child's parent or guardian as required by law, we will comply with applicable legal requirements to delete the information.

## **Changes to this Privacy Policy**

We reserve the right to modify this Privacy Policy at any time. If we make material changes to this Privacy Policy, we will notify you by updating the date of this Privacy Policy and posting it on the Service or other appropriate means. Any modifications to this Privacy Policy will be effective upon our posting the modified version (or as otherwise indicated at the time of posting). In all cases, your use of the Service after the effective date of any modified Privacy Policy indicates your acknowledging that the modified Privacy Policy applies to your interactions with the Service and our business.

#### How to contact us

Email: info@newblueptrs.com

Mail: 44 South Broadway, White Plains, NY 10601, Attention: Privacy

Phone: +1 (914) 455-0800