

PRIVACY POLICY

INTRODUCTION

LEGACY EDUCATION AFFORDABILITY FUND, ("we," "our," or "us") is committed to protecting the privacy of our website users ("you" or "your"). This Privacy Policy outlines how we collect, use, disclose, and safeguard your information when you visit our website www.sgoleaf.com. Please read this policy carefully to understand our views and practices regarding your personal data and how we will treat it. If you do not agree with our policies and our practices, please do not use our website and its related services (together, the "Services").

INFORMATION WE COLLECT

We collect personal information that you voluntarily provide to us when you express an interest in obtaining information about us or our products and Services, when you participate in activities on the Services, or otherwise when you contact us. We do not process sensitive information. All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information. We do not process sensitive information. We may collect and process the following data about you:

- Names
- Phone numbers
- Email addresses
- Billing addresses
- Debit/credit card numbers

INFORMATION AUTOMATICALLY COLLECTED

We automatically collect certain information when you visit, use, or navigate the Services. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Services, and other technical information. This information is primarily needed to maintain the security and operation of our Services, and for our internal analytics and reporting purposes.

Other information we collect includes:

1. Log and Usage Data

Log and usage data is service-related, diagnostic, usage, and performance information our servers automatically collect when you access or use our Services and which we record in log files. Depending on how you interact with us, this log data may include your IP address, device information, browser type, and settings and information about your activity in the Services (such as the date/time stamps associated with your usage, pages and files viewed, searches, and other actions you take such as which features you use), device event information (such as system activity, error reports (sometimes called "crash dumps"), and hardware settings).

2. Device Data

We collect device data such as information about your computer, phone, tablet, or other device you use to access the Services. Depending on the device used, this device data may include information such as your IP address (or proxy server), device and application identification numbers, location, browser type, hardware model, Internet service provider and/or mobile carrier, operating system, and system configuration information.

3. Location Data

We collect location data such as information about your device's location, which can be either precise or imprecise. How much information we collect depends on the type and settings of the device you use to access the Services. For example, we may use GPS and other technologies to collect geolocation data that tells us your current location (based on your IP address). You can opt out of allowing us to collect this information either by refusing access to the information or by disabling your Location setting on your device. However, if you choose to opt out, you may not be able to use certain aspects of the Services.

INFORMATION COLLECTED FROM OTHER SOURCES

To enhance our ability to provide relevant marketing, offers, and services to you and update our records, we may obtain information about you from other sources, such as public databases, joint marketing partners, affiliate programs, data providers, and from other third parties. This information includes mailing addresses, job titles, email addresses, phone numbers, intent data (or user behavior data), Internet Protocol (IP) addresses, social media profiles, social media URLs, and custom profiles, for purposes of targeted advertising and event promotion.

HOW WE PROCESS YOUR INFORMATION

We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent. We process your personal information for a variety of reasons, depending on how you interact with our Services, including:

- To deliver and facilitate delivery of services to the user. We may process your information to provide you with the requested service.
- To respond to user inquiries/offer support to users. We may process your information to respond to your inquiries and solve any potential issues you might have with the requested service.
- To fulfill and manage your orders. We may process your information to fulfill and manage your orders, payments, returns, and exchanges made through the Services.
- To enable user-to-user communications. We may process your information if you choose to use any of our offerings that allow for communication with another user.
- To request feedback. We may process your information when necessary to request feedback and to contact you about your use of our Services.
- To deliver targeted advertising to you. We may process your information to develop and display personalized content and advertising tailored to your interests, location, and more.
- To identify usage trends. We may process information about how you use our Services to better understand how they are being used so we can improve them.

- To determine the effectiveness of our marketing and promotional campaigns. We may process your information to better understand how to provide marketing and promotional campaigns that are most relevant to you.
- To save or protect an individual's vital interest. We may process your information when necessary to save or protect an individual's vital interest, such as to prevent harm.

LEGAL BASES RELIED ON TO PROCESS YOUR INFORMATION

We only process your personal information when we believe it is necessary and we have a valid legal basis to do so under applicable law, like with your consent, to comply with laws, to provide you with services to enter into or fulfill our contractual obligations, to protect your rights, or to fulfill our legitimate business interests.

1. Legal Obligations

We may process your information where we believe it is necessary for compliance with our legal obligations, such as to cooperate with a law enforcement body or regulatory agency, exercise or defend our legal rights, or disclose your information as evidence in litigation in which we are involved.

2. Vital Interests

We may process your information where we believe it is necessary to protect your vital interests or the vital interests of a third party, such as situations involving potential threats to the safety of any person.

3. If You Are Located in the European Union (EU) or United Kingdom (UK):

The General Data Protection Regulation ("GDPR") and UK GDPR require us to explain the valid legal bases we rely on to process your personal information. As such, we may rely on the following legal bases to process your personal information:

- **Consent:** We may process your information if you have given us consent to use your personal information for a specific purpose. You may withdraw your consent at any time by providing written notice to us at our contact information below.
- **Performance of a Contract:** We may process your personal information when we believe it is necessary to fulfill our contractual obligations to you, including providing our Services or at your request prior to entering a contract with you.
- **Legitimate Interests:** We may process your information when we believe it is reasonably necessary to achieve our legitimate business interests and those interests do not outweigh your interests and fundamental rights and freedoms. For example, we may process your personal information for some of the purposes described in order to:
 - Develop and display personalized and relevant advertising content for our users.
 - Analyze how our Services are used so we can improve them to engage and retain users.
 - Support our marketing activities.
 - Understand how our users use our products and services so we can improve user experience.

4. If You Are Located in Canada:

We may process your information if you have given us specific permission (i.e., express consent) to use your personal information for a specific purpose, or in situations where your permission can be inferred (i.e., implied consent). You may withdraw your consent at any time by providing written notice to us at our contact information below.

5. Processing Information Without Consent

In some exceptional cases, we may be legally permitted under applicable law to process your information without your consent, including, for example:

- If collection is clearly in the interests of an individual and consent cannot be obtained in a timely way.
- For investigations and fraud detection and prevention.
- For business transactions provided certain conditions are met.
- If it is contained in a witness statement and the collection is necessary to assess, process, or settle an insurance claim.
- For identifying injured, ill, or deceased persons and communicating with next of kin.
- If we have reasonable grounds to believe an individual has been, is, or may be victim of financial abuse.
- If it is reasonable to expect collection and use with consent would compromise the availability or the accuracy of the information and the collection is reasonable for purposes related to investigating a breach of an agreement or a contravention of the laws of Canada or a province.
- If disclosure is required to comply with a subpoena, warrant, court order, or rules of the court relating to the production of records.
- If it was produced by an individual in the course of their employment, business, or profession and the collection is consistent with the purposes for which the information was produced.
- If the collection is solely for journalistic, artistic, or literary purposes.
- If the information is publicly available and is specified by the regulations.

WHEN AND WITH WHOM WE SHARE YOUR PERSONAL INFORMATION

We may share information in specific situations described in this section and/or with the following third parties, including but not limited to, in the following situations:

1. Business Transfers

We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.

2. Affiliates

We may share your information with our affiliates, in which case we will require those affiliates to honor this Privacy Policy. Affiliates include our parent company and any subsidiaries, joint venture partners, or other companies that we control or that are under common control with us.

3. Business Partners

We may share your information with our business partners to offer you certain products, services, or promotions.

4. Other Users

When you share personal information or otherwise interact with public areas of the Services, such personal information may be viewed by all users and may be publicly made

available outside the Services in perpetuity. Similarly, other users will be able to view descriptions of your activity, communicate with you within our Services, and view your profile.

DATA RETENTION

We will only keep your personal information for as long as it is necessary for the purposes set out in this Privacy Policy, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements). When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

DISCLOSURE OF YOUR INFORMATION

We may share your information in the following situations:

- With service providers to monitor and analyze the use of our website.
- To comply with legal obligations, such as responding to a subpoena or court order.
- To protect and defend our rights or property.
- To prevent or investigate possible wrongdoing in connection with the website.
- To protect the personal safety of users of the website or the public.

We may use your personal information for our own business purposes, such as for undertaking internal research for technological development and demonstration. This is not considered to be "selling" of your personal information. We will not sell or share personal information in the future belonging to website visitors, users, and other consumers.

INFORMATION SECURITY

We have implemented appropriate and reasonable technical and organizational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the Services within a secure environment.

PRIVACY RIGHTS

In some regions (e.g., European Economic Area, UK, Switzerland, and Canada), you have certain rights under applicable data protection laws. These may include the right (i) to request access

and obtain a copy of your personal information, (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; (iv) if applicable, to data portability; and (v) not to be subject to automated decision-making. In certain circumstances, you may also have the right to object to the processing of your personal information. You can make such a request by contacting us by writing at our contact information below. We will consider and act upon any request in accordance with applicable data protection laws.

1. Withdrawing Consent

If we are relying on your consent to process your personal information, which may be express and/or implied consent depending on the applicable law, you have the right to withdraw your consent at any time. You may withdraw your consent at any time by providing written notice to us at our contact information below. However, please note that this will not affect the lawfulness of the processing before its withdrawal nor, when applicable law allows, will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

2. Opting Out of Marketing and Promotional Communications

You can unsubscribe from our marketing and promotional communications at any time by clicking on the unsubscribe link in the emails that we send, replying "STOP" or "UNSUBSCRIBE" to the SMS messages that we send (if applicable), or by contacting us using in writing at contact information below. You will then be removed from the marketing lists. However, we may still communicate with you — for example, to send you service-related messages that are necessary for the administration and use of your account, to respond to service requests, or for other non-marketing purposes.

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 inform you about that practice in a revised version of this Privacy Policy.

YOUR RIGHTS UNDER OHIO AND OTHER STATE LAWS

You have rights under certain US state data protection laws. However, these rights are not absolute, and in certain cases, we may decline your request as permitted by law. These rights include:

- Right to know whether or not we are processing your personal data.
- Right to access your personal data.
- Right to correct inaccuracies in your personal data.
- Right to request the deletion of your personal data.
- Right to obtain a copy of the personal data you previously shared with us.
- Right to non-discrimination for exercising your rights.

- Right to opt out of the processing of your personal data if it is used for targeted advertising, the sale of your data, or profiling in furtherance of decisions that produce legal or similarly significant effects (“Profiling”).

Depending upon the state where you live, you may also have the following rights:

- Right to access the personal data we hold about you, request correction of inaccurate data, request deletion of your data, object to its processing, request restrictions on its processing, and request the transfer of your personal data to another organization (as permitted by applicable law, including Ohio’s privacy law).
- Right to obtain a list of the categories of third parties to which we have disclosed personal data (as permitted by applicable law, including California’s and Delaware’s privacy law).
- Right to obtain a list of specific third parties to which we have disclosed personal data (as permitted by applicable law, including Oregon’s privacy law).
- Right to limit use and disclosure of sensitive personal data (as permitted by applicable law, including California’s privacy law).
- Right to opt out of the collection of sensitive data and personal data collected through the operation of a voice or facial recognition feature (as permitted by applicable law, including Florida’s privacy law).

EXERCISING YOUR RIGHTS

To exercise these rights, you may withdraw your consent at any time by providing written notice to us at our contact information below.

Under certain U.S. state data protection laws, you can designate an authorized agent to make a request on your behalf. We may deny a request from an authorized agent that does not submit proof that they have been validly authorized to act on your behalf in accordance with applicable laws.

1. Request Verification

Upon receiving your request, we will need to verify your identity to determine you are the same person about whom we have the information in our system. We will only use personal information provided in your request to verify your identity or authority to make the request. However, if we cannot verify your identity from the information already maintained by us, we may request that you provide additional information for the purposes of verifying your identity and for security or fraud-prevention purposes.

If you submit the request through an authorized agent, we may need to collect additional information to verify your identity before processing your request and the agent will need to provide a written and signed permission from you to submit such request on your behalf.

2. Appeals

Under certain US state data protection laws, if we decline to take action regarding your request, you may appeal our decision by contacting us via emailing at our contact information below. We will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions. If your appeal is denied, you may submit a complaint to your respective state attorney general.

DATA SECURITY

We implement appropriate technical and organizational measures to protect your personal data against accidental or unlawful destruction, loss, alteration, unauthorized disclosure, or access. Our cybersecurity program complies with the Ohio Data Protection Act (“ODPA”) requirements, providing a legal safe harbor against data breach claims.

CHANGES TO THIS PRIVACY POLICY

We may update this Privacy Policy from time to time. The updated version will be indicated by an updated "Revised" date at the top of this Privacy Policy. If we make material changes to this Privacy Policy, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this Privacy Policy frequently to be informed of how we are protecting your information.

CONTACT US

If you have questions or comments about this Privacy Policy, or you wish to withdraw consent, you may contact us at leaf1sgo@gmail.com.

This Privacy Policy is effective/updated as of December 1, 2025.