



PRIVACY NOTICE

Updated April 30, 2026

This Privacy Notice describes how Fifr, Inc. ("Fifr," "we," "us," or "our") collects, uses, shares, retains, and protects personal information. It applies to our current, former, and prospective clients, users of our website or other online services, and other individuals who interact with us.

Fifr is an investment adviser registered with the U.S. Securities and Exchange Commission. As part of our advisory relationship with clients, we collect and maintain certain nonpublic personal information, including financial information, tax-related information, and other information needed to provide advisory and related services.

We are committed to protecting the confidentiality and security of the information entrusted to us.

1. Information We Collect

We collect personal information from several sources, including information you provide directly, information we receive from third parties, and information collected automatically when you interact with our website or online services.

1.1 Information You Provide to Us

We may collect information that you provide directly to us, including:

- Name, address, email address, phone number, date of birth, and other contact or identifying information;
- Social Security number, taxpayer identification number, government-issued identification, and similar information needed for account opening, tax, regulatory, or identity-verification purposes;
- Financial information, including income, net worth, assets, liabilities, investment objectives, risk tolerance, financial goals, account balances, holdings, transactions, and cash-flow information;
- Tax-related information, including tax forms, filing status, deductions, credits, income sources, estimated tax information, and other information relevant to tax planning or tax-related services;
- Employment, business, family, estate, insurance, charitable, and other planning-related information;
- Account login, billing, payment, and service-preference information;
- Communications with us, including emails, messages, meeting notes, documents, and information submitted through forms, portals, or other tools.

1.2 Information We Receive From Third Parties

We may receive personal information about you from third parties, including:

- Custodians, broker-dealers, banks, financial institutions, and other account providers;
- Financial planning, account aggregation, portfolio management, tax, billing, compliance, and technology platforms;
- Accountants, attorneys, insurance professionals, estate planning professionals, and other professional advisers;
- Employers, benefit plan providers, payroll providers, or other service providers when relevant to the services we provide;
- Publicly available sources and other lawful third-party sources.

This information may include account information, balances, holdings, transactions, tax information, estate and trust information, insurance information, employment or benefits information, and other information relevant to our services.



1.3 Information Collected Automatically

When you visit our website or interact with certain online services, we may automatically collect limited technical information, such as:

- IP address;
- Browser type;
- Device type;
- Operating system;
- Pages viewed;
- Referring website;
- Date and time of visit;
- General usage and performance data.

We may use cookies, analytics tools, and similar technologies to help us understand website usage, improve functionality, maintain security, and evaluate the effectiveness of our communications.

2. How We Use Information

We use personal information for lawful business, advisory, operational, compliance, and service-related purposes, including to:

- Provide investment advisory, financial planning, tax-planning, financial wellness, and related services;
- Open, maintain, and service client accounts;
- Communicate with clients and prospective clients;
- Prepare financial plans, investment recommendations, tax-planning analyses, reports, and other client deliverables;
- Process billing, payments, and administrative requests;
- Maintain client records;
- Monitor, improve, and personalize our services;
- Operate, maintain, and improve our website, technology systems, and client service processes;
- Manage cybersecurity, fraud prevention, identity verification, and operational risk;
- Comply with legal, regulatory, supervisory, recordkeeping, and reporting obligations;
- Respond to regulators, courts, law enforcement, or other lawful requests;
- Enforce agreements and protect our rights, property, clients, personnel, and business.

We may also use aggregated or de-identified information for internal business, analytics, compliance, or service-improvement purposes, provided that such information does not identify a specific individual.

3. How We Share Information

We do not sell personal information. We do not rent or trade client information. We do not share nonpublic personal information with nonaffiliated third parties for their own marketing purposes.

We may share personal information only as needed to provide services, operate our business, comply with law, or as otherwise permitted or required by applicable law.

3.1 Service Providers and Technology Vendors

We may share information with third-party service providers that assist us in operating our business and providing services. These may include custodians, portfolio management platforms, financial planning software providers, tax software providers, account aggregation providers, billing providers, CRM providers, email and cloud storage providers, cybersecurity providers, compliance consultants, and other business or technology



vendors.

These providers are permitted to use personal information only as necessary to provide services to us or as otherwise permitted by law and applicable contractual obligations.

3.2 Financial Institutions and Custodians

We may share information with custodians, broker-dealers, banks, investment platforms, and other financial institutions as necessary to open, maintain, service, transfer, or manage client accounts, process transactions, or provide advisory services.

3.3 Professional Advisers and Client-Authorized Parties

At your direction or with your consent, we may share information with your accountant, attorney, insurance professional, estate planning professional, family member, household member, employer, benefit provider, or other authorized third party.

3.4 Legal, Regulatory, and Compliance Purposes

We may disclose information to regulators, courts, law enforcement, government agencies, auditors, compliance consultants, attorneys, or other parties when we believe disclosure is required or appropriate to:

- Comply with applicable law, regulation, subpoena, examination, inquiry, or legal process;
- Respond to regulatory or supervisory authorities;
- Protect against fraud, unauthorized activity, cybersecurity threats, or other legal or operational risks;
- Enforce our agreements or protect our rights, property, personnel, clients, or business.

3.5 Business Transactions

If Fifr is involved in a merger, acquisition, financing, reorganization, sale of assets, assignment of advisory agreements, or similar business transaction, personal information may be disclosed or transferred as part of that transaction, subject to applicable law and confidentiality obligations.

3.6 Affiliates

Fifr does not currently share client nonpublic personal information with affiliates for marketing purposes. If our practices change, we will update this notice as required by applicable law.

4. Client Financial Privacy

Federal law gives consumers the right to limit some, but not all, sharing of personal financial information. Federal law also requires us to tell you how we collect, share, and protect your personal information. For purposes of this section, “nonpublic personal information” generally means personally identifiable financial information about a client or prospective client that is not publicly available.

4.1 Information We Collect

We collect nonpublic personal information from:

- Information you provide to us on applications, agreements, forms, questionnaires, portals, emails, and other communications;
- Information about your accounts, transactions, holdings, balances, income, assets, liabilities, and financial goals;
- Information from custodians, financial institutions, account aggregation providers, tax documents, and



- other service providers;
- Information from other professionals or third parties you authorize.

4.2 Information We Disclose

We may disclose nonpublic personal information to nonaffiliated third parties only as permitted or required by law, including:

- To service providers that help us provide advisory, financial planning, tax-planning, technology, billing, administrative, custodial, compliance, legal, or operational services;
- To process or service transactions and accounts;
- To maintain or service client relationships;
- To comply with legal, regulatory, examination, or recordkeeping requirements;
- With your consent or at your direction.

4.3 Former Clients

We apply the same privacy protections to former clients that we apply to current clients, subject to applicable legal and regulatory recordkeeping requirements.

4.4 Your Choices

Because we do not sell personal information and do not share nonpublic personal information with nonaffiliated third parties for their own marketing purposes, there is generally no need for you to opt out of that type of sharing.

You may contact us at any time with questions about our privacy practices or to request that we update, correct, or limit certain information, subject to our legal, regulatory, and operational obligations.

5. Use of Artificial Intelligence and LLM Tools

We may use artificial intelligence tools, including large language model tools, to assist with internal business processes, client service, drafting, summarization, research, workflow management, quality control, and operational efficiency.

When using these tools, we seek to protect client confidentiality and limit the use of personal information to what is reasonably necessary for the relevant business purpose. Where supported by vendor settings and agreements, we configure these tools so that client information is not used by third-party providers to train their general-purpose models.

We do not intend for clients to submit highly sensitive personal information into public or unaffiliated chatbot tools. If we offer a chatbot, portal, or other AI-enabled tool, we may process information submitted through that tool to respond to the request, maintain the tool, improve our systems, troubleshoot issues, and comply with legal and regulatory obligations.

6. Cookies and Website Analytics

We may use cookies and similar technologies to operate our website, remember preferences, analyze website traffic, improve website performance, and maintain security.

We may use analytics tools, such as Google Analytics or similar services, to understand how visitors use our website. These tools may collect information such as IP address, device type, browser type, pages viewed,



referring website, and general usage activity.

We do not currently use advertising pixels, retargeting pixels, lookalike audience tools, or similar technologies to target advertisements based on your activity on our website.

We do not knowingly sell personal information. We do not currently share personal information for cross-context behavioral advertising. If our website practices change, we will update this notice and provide any required choices or opt-out mechanisms.

You can usually adjust your browser settings to refuse or delete cookies. Some website features may not function properly if cookies are disabled.

7. Email and Marketing Communications

We may send service-related emails, administrative notices, disclosure documents, regulatory notices, account-related messages, and other communications related to our services.

We may also send occasional marketing or informational communications about Fifr's services. You may opt out of marketing emails by using the unsubscribe instructions in the email or by contacting us at info@fifr.io. Please note that even if you opt out of marketing emails, we may still send service, legal, regulatory, billing, account, or relationship-related communications.

8. Data Retention

We retain personal information for as long as reasonably necessary to provide services, maintain business records, comply with legal and regulatory obligations, resolve disputes, enforce agreements, and support legitimate business purposes.

Because Fifr is a registered investment adviser, we are required to maintain certain books and records for specified periods. We may be unable to delete information that we are required or permitted to retain for legal, regulatory, compliance, security, or operational reasons.

9. Security

We maintain administrative, technical, and physical safeguards designed to protect personal information against unauthorized access, disclosure, misuse, alteration, loss, or destruction.

These safeguards may include access controls, authentication procedures, encryption, vendor diligence, employee training, monitoring, backups, and other security measures.

No method of transmission, storage, or electronic communication is completely secure. You should use care when sending sensitive information electronically and should avoid sending highly sensitive information through unsecured channels.

10. Your Privacy Requests

You may contact us to request access to, correction of, deletion of, or limitations on certain personal information. We will review and respond to requests in accordance with applicable law.



Some requests may be limited by legal, regulatory, recordkeeping, security, fraud-prevention, or operational requirements. For example, we may be required to retain certain records even after a client relationship ends.

To submit a privacy request, contact us at:

Email: info@fifr.io

Phone: +1 (818) 605-4900

Mail: Fifr, Inc., 1504A Boscobel St, Nashville, TN 37206

We may need to verify your identity before responding to certain requests.

11. Children's Privacy

Our services are intended for adults and are not directed to children under 18. We do not knowingly collect personal information directly from children under 18. If we learn that we have collected personal information directly from a child under 18 without appropriate consent, we will take reasonable steps to delete it.

Parents or guardians who believe a child has provided us with personal information may contact us at info@fifr.io.

12. California Residents

This section applies to California residents to the extent California privacy law applies to personal information we collect.

Much of the personal information we collect in connection with investment advisory, financial planning, tax-planning, and related financial services may be subject to federal financial privacy laws and may be exempt from certain California privacy law requirements.

Subject to applicable exceptions, California residents may have the right to:

- Request information about the categories and specific pieces of personal information we collect;
- Request information about the categories of sources from which we collect personal information;
- Request information about the purposes for which we use personal information;
- Request information about the categories of third parties to whom we disclose personal information;
- Request deletion of certain personal information;
- Request correction of inaccurate personal information;
- Opt out of the sale or sharing of personal information, if applicable;
- Not be discriminated against for exercising applicable privacy rights.

We do not knowingly sell personal information. We do not currently share personal information for cross-context behavioral advertising. To the extent we previously used advertising tools that may have involved the sharing of website usage information for advertising purposes, we no longer use those tools.

To submit a California privacy request, contact us at info@fifr.io. We may need to verify your identity before processing your request. You may also authorize an agent to submit a request on your behalf, subject to verification and proof of authorization.

13. Vermont Residents

We will not disclose nonpublic personal financial information about Vermont residents to nonaffiliated third parties, other than as permitted by law, unless the Vermont resident authorizes us to make the disclosure.



We may disclose information as necessary to process or service transactions, maintain accounts, provide advisory or related services, comply with legal or regulatory requirements, or as otherwise permitted by law.

If you are a Vermont resident and have questions about your privacy choices, please contact us at info@fifr.io.

14. International Visitors

Fifr's services are intended for residents of the United States. If you access our website or services from outside the United States, you understand that your information may be processed in the United States, where privacy laws may differ from those in your jurisdiction.

15. Changes to This Notice

We may update this Privacy Notice from time to time. When we make changes, we will update the revision date above. If required by law, we will provide additional notice or obtain consent.

16. Contact Us

If you have questions about this Privacy Notice or our privacy practices, you may contact us at:

Fifr, Inc.
1504A Boscobel St
Nashville, TN 37206
Email: info@fifr.io
Phone: +1 (818) 605-4900