

# KLEAR INC.

## Privacy Policy

**Last Updated: December 5, 2025**

This Privacy Policy (“Policy”) explains how KLEAR Inc., a Delaware corporation (“Klear” “we”, “us” or “our”), applies its privacy practices to the information we collect, process, and use through our website - klear.capital - and any mirrored landing pages, emails we send, and our mobile or desktop applications (collectively, the “Services”).

This Policy describes how we collect, use, share and secure the personal data of the users of Services (the “User(s)” or “you” or “yours”, as applicable). It also describes the User’s choices regarding use, access and correction of the User’s personal data.

By using our Services, you express your unconditional agreement with this Policy and the conditions of processing the personal data contained herein. If you do not accept this Policy, do not use our Services or provide any Personal Information to us.

### **1. Information We Collect**

Klear gathers the following categories of information: (1) personally identifiable information that is supplied voluntarily upon registration for Services; (2) aggregate tracking and site usage information that is gathered automatically when you use the Services; or (3) information obtained from third-parties.

#### **A. Information You Provide to Us**

##### **Personal Information**

When you register for an account to access or utilize our Services (an “Account”), we may ask for and may collect Personal Information that can be used to identify you, which may include an identifier such as a name, email address, or online identifier (“Personal Information”).

##### **Commercial Information**

If you subscribe to or use our Services, we may collect information about your business transactions facilitated through the platform. This may include details about invoices, receivables, payment obligations, credit terms, repayment history, funding requests, and other activity related to trade finance or factoring services (“Transaction Information”). We use this Transaction Information to:

- Process and service your financing requests;
- Evaluate creditworthiness, repayment capacity, and fraud risk;
- Provide reporting and analytics to you regarding your account;

- Comply with legal, contractual, and regulatory obligations (including KYC/AML recordkeeping); and
- Improve and develop the Services.

Transaction Information may be combined with other information you provide or that we collect automatically (e.g., account metadata, communications, and usage logs) to help us operate the Services securely and effectively.

#### **B. Information Collected Automatically**

We and our third-party service providers, including analytics and third-party content providers, may automatically collect certain information from you whenever you access or interact with the Services. This information may include, among other information, the browser and operating system you are using, the URL or advertisement that referred you to the Services, the search terms you entered into a search engine that led you to the Services, areas within the Services that you visited, which links you clicked on, which pages or content you viewed and for how long, other similar information and statistics about your interactions, such as content response times, download errors and length of visits to certain pages and other information commonly shared when browsers communicate with websites. We may combine this automatically collected log information with other information we collect about you. We do this to improve services we offer you, and to improve marketing, analytics, and site functionality.

The information we collect include your IP address, which is a number assigned to your computer or internet-enabled device whenever you access the internet. It allows computers and servers to recognize and communicate with one another. IP addresses from which visitors appear to originate may be recorded for IT security and system diagnostic purposes. This information may also be used in aggregate form to maintain and improve Services and to generate and analyze statistics about Services and your use of Services.

We may use the following technology to automatically collect information from you:

##### **Cookies**

Cookies are text files put on your computer to collect standard internet log information and visitor behavior information. This information is then used to track visitor use of the website and to create statistical reports on website activity. A cookie may also convey anonymous information about how you browse the Services to us. A cookie does not collect Personal Information about you.

You can set your web browser or device to refuse all cookies or to indicate when a cookie is being sent. However, some features of the Services may not function properly if the ability to accept cookies is disabled.

#### **C. Third Party Services**

We may provide an option to access or register for Services through the use of your user-name and passwords for certain services provided by third parties (each, a “Third Party Services”), such as through the use of your Google account. By authorizing us to connect with a Third-Party Services, you authorize Klear to access and store the information that the Third-Party Services makes available to us, and to use and disclose it in accordance with this Policy. It is your responsibility to check your privacy settings for such Third-Party Services (please review the terms of use and privacy policy of such Third-Party Services) to control what information is available to us.

## **2. How We Use Information**

### **Permitted Purposes**

We may use the information we collect about you (including Personal Information, to the extent applicable) for a variety of purposes, including to (a) provide, operate, maintain, improve, and promote our Services; (b) enable you to access and use Services; (c) process and complete transactions; (d) provide customer service and support and send you related notices; (e) send promotional communications; (f) monitor and analyze trends, usage, and activities in connection with Services and for marketing or advertising purposes; and (g) monitor and assess compliance with our policies and standards.

We also use your information with your consent: (h) to serve advertising tailored to your interests on our Services and Third-Party Services; (i) to notify you about changes to our Services or any products or services we offer or provide through it; and (j) for other purposes for which we obtain your consent.

## **3. How We Share the Information**

### **Third-Party Services Providers**

We share information, including Personal Information, with our third-party service providers that we use to provide hosting for and maintenance of Services. These third-party service providers may have access to or process your Personal Information for the purpose of providing these services for us. We do not permit our third-party service providers to use the Personal Information that we share with them for their marketing purposes or for any other purpose than in connection with the services they provide to us.

We may also instruct the third-party service providers to process personal data for the permitted purposes set forth in Section 2 above on our behalf and in accordance with our instructions only. We will retain control over and will remain fully responsible for your personal data and will use appropriate safeguards as required by applicable law to ensure the integrity and security of your personal data when engaging such service providers.

### **Analytic Providers and/or Advertising Partners**

We work with (or may in the future work with) network advertisers, ad agencies, analytics service providers and other vendors to provide us with information regarding traffic on the Services, including pages viewed and the actions taken when visiting the Services; to serve our advertisements on other website, within mobile apps and elsewhere online; and to provide us with information regarding the use of the Services and the effectiveness of our advertisements. Our service providers may collect information about your visits to and activity on the Services as well as other websites or services, they may set and access their own tracking technologies on your device and may use that information to show you targeted advertisements. If you wish to opt out of interest-based advertising, please contact our dedicated consumer privacy team at [privacy@klearbusiness.com](mailto:privacy@klearbusiness.com). If you choose to opt out, please note you may still receive generic ads.

#### Compliance with Law

We may share your personal data with courts, law enforcement authorities, regulators or attorneys or other parties where it is reasonably necessary for the establishment, exercise or defense of a legal or equitable claim, or for the purposes of a confidential alternative dispute resolution process. We may also share such information if we believe it is necessary in order to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our terms and conditions, or as otherwise required by law.

#### Organizational Changes

We may share your personal data with any third party to whom we assign or novate any of our rights or obligations, or that acquires all or substantially all of our business, stock or assets, or with whom we merge.

#### Aggregate Data

We may also use aggregated personal data and statistics for the purpose of monitoring website usage in order to help us develop and improve our Services.

#### With your Consent

We will otherwise only disclose your personal data when you direct us or give us permission to do so, when we are required by applicable law or regulations or judicial or official request to do so, or as required to investigate actual or suspected fraudulent or criminal activities.

Where we rely on your consent to process the Personal Information, you have the right to withdraw or decline your consent at any time. Please note that this does not affect the lawfulness of the processing based on consent before its withdrawal.

If we ask you to provide Personal Information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your Personal Information is mandatory or not (as well as of the possible consequences if you do not provide your Personal Information). Similarly, if we collect and use your Personal Information in

reliance on our (or a third party's) legitimate interests which are not already described in this Notice, we will make clear to you at the relevant time what those legitimate interests are.

If you have any questions about or need further information concerning the legal basis, on which we collect and use your Personal Information, please contact our dedicated consumer privacy team at [privacy@klearbusiness.com](mailto:privacy@klearbusiness.com).

#### Artificial Intelligence Tool

Klear may use artificial-intelligence-enabled tools solely to assist with internal operational support and analysis based on publicly available information. Klear does not provide Personal Information to such tools for model training, product development, or any independent use.

### **4. How Long We Retain Your Personal Information**

We will retain your Personal Information for as long as is needed to fulfill the purposes outlined in this 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 it, 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. For Personal Information that we process on behalf of our Registered Users, we will retain such Personal Information in accordance with the terms of our agreement with them, subject to applicable law.

### **5. Your Privacy Rights**

Upon request we will provide you with information about whether we hold, or process on behalf of a third party, any of your Personal Information. Users may update or change their Account Information by editing their profile within Services. To make a request to have Personal Information maintained by us returned to you or removed, please contact our dedicated consumer privacy team at [privacy@klearbusiness.com](mailto:privacy@klearbusiness.com). Requests to access, change, or remove your information will be handled within thirty (30) days; provided that, notwithstanding such request, this information may be retained for as long as you maintain an account for Services, or as needed to provide you with Services, comply with our legal obligations, resolve disputes and enforce our agreements.

#### Objections to Processing of Personal Information

It is your right to lodge an objection to the processing of your personal data if you feel the “ground relating to your particular situation” applies. The only reasons we will be able to deny your request is if we can show compelling legitimate grounds for the processing, which override your interest, rights and freedoms, or the processing is for the establishment, exercise or defense of a legal claims. To invoke this right, please contact our dedicated consumer privacy team at [privacy@klearbusiness.com](mailto:privacy@klearbusiness.com) We will

consider your request in accordance with applicable laws. To protect your privacy and security, we may take steps to verify your identity before complying with the request.

#### Policy Regarding Children

Services are not directed to children under the age of thirteen and we do not knowingly collect personally identifiable information from children under the age of eighteen (18) as part of Services. If we become aware that we have inadvertently received personally identifiable information from a User under the age of thirteen as part of Services, we will delete such information from our records. If we change our practices in the future, we will obtain prior, verifiable parental consent before collecting any personally identifiable information from children under the age of thirteen as part of Services.

#### Online Advertising

We use online platforms with advertisement functionalities such as Facebook, Instagram, LinkedIn, Youtube, or other third-party platforms (the “Ad Platforms”) to promote our Services through interest-based ads. We do not, however, share your Personal Information with the Ad Platforms for the promotion of our Services through interest-based ads.

If you do not want to receive interest-based ads on the Ad Platforms, you can adjust your ad preference in accordance with the instructions provided by such Ad Platform.

#### **6. Changes to our Privacy Policy**

If we change the Policy, we will post the revised Policy here with an updated revision date. Please check frequently the Site to see if the Policy is changed. If we make significant changes to our statement, we also may, but are not obliged to, notify all members whose Personal Information we have retained by means such as sending an email or posting a notice on our Site. Your continued use of Services constitutes your acceptance of all such changes and amendments. Your sole remedy is to cease using Services.

#### **7. Contacting Us**

If you have any questions regarding this Policy or information we hold about you, you may contact our dedicated consumer privacy team at [privacy@klearbusiness.com](mailto:privacy@klearbusiness.com). Please note that this inbox is monitored exclusively for privacy-related inquiries. In order for us to take the appropriate action, please describe in reasonable detail the nature of your request or inquiry.

#### **8. Privacy Notice for California Residents.**

This Privacy Notice for California Residents (this “Notice”) supplements the information contained in Klear’s Privacy Policy and applies solely to residents of the State of California. We adopt this notice to comply with the California Consumer Privacy Act of 2018 (CCPA), as amended by the California Privacy Rights Act of 2020 (CPRA). Any terms defined in the CCPA/CPRA have the same meaning when used in this Notice.

#### **A. Information We Collect**

The categories of personal information we collect are described in the “Information We Collect” section of the Privacy Policy. We collect this information directly from you, automatically when you interact with our Services, and from third parties (e.g., financing partners, analytics providers, fraud-prevention services).

We use the information for the purposes described in the “How We Use Personal Information” section of the Privacy Policy.

#### **B. Your Rights**

As a California resident, you have the following rights with respect to your personal information, subject to applicable exceptions:

1. Right to Know/Access – You may request that we disclose the categories and specific pieces of personal information we have collected about you, the categories of sources, our business purposes for collection, the categories of third parties with whom we share it, and the categories of personal information we have sold or shared (if any).
2. Right to Data Portability – You may request a copy of the specific personal information we hold about you in a portable and readily usable format.
3. Right to Delete – You may request that we delete personal information we collected from you, subject to exceptions (e.g., to comply with law, detect fraud, complete a transaction).
4. Right to Correct – You may request that we correct inaccurate personal information we maintain about you.
5. Right to Opt Out of Sale/Sharing – You may opt out of the sale or sharing of your personal information for cross-context behavioral advertising. Klear does not sell personal information for monetary value, but we may “share” limited cookie or tracking data with analytics or advertising partners. You can opt out by emailing [privacy@klearbusiness.com](mailto:privacy@klearbusiness.com) or by using browser-based opt-out preference signals (e.g., Global Privacy Control).
6. Right to Limit Use of Sensitive Personal Information – If we collect sensitive personal information, you may direct us to limit its use to only those purposes necessary to provide the Services (e.g., identity verification, fraud prevention, compliance). Sensitive personal information may include government ID numbers, financial account credentials, or other information collected to comply with KYC/AML laws.”
7. Right to Non-Discrimination – You will not be denied goods or services, charged different prices, or provided a different level of quality for exercising your privacy rights.

#### **C. Exercising Your Rights**

To exercise your rights described above, please submit a verifiable consumer request to us by emailing our dedicated privacy request address: [privacy@klearbusiness.com](mailto:privacy@klearbusiness.com). Only you, or a person legally

authorized to act on your behalf, may make a verifiable consumer request related to your personal information.

A verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information (or their authorized agent). This may include your first and last name, email address associated with your account, and phone number.
- Describe your request with sufficient detail so we can understand, evaluate, and respond to it.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. We will confirm receipt of your request within 10 business days and respond within 45 calendar days, subject to extension where permitted by law.

We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.