

PRIVACY POLICY

Autumn Lane Advisory LLC

Effective Date: August 2026

INTRODUCTION

Autumn Lane Advisory LLC (“Adviser”) is committed to protecting the confidentiality, integrity, and security of non-public personal information and confidential business information received in connection with its advisory and strategic consulting activities.

This Privacy Policy describes how the Adviser collects, uses, safeguards, and shares information relating to clients, prospective clients, institutional counterparties, and other parties with whom the Adviser conducts business.

INFORMATION WE COLLECT

The Adviser may collect non-public personal, financial, or confidential information from a variety of sources, including:

- Information provided directly by clients or prospective clients (e.g., contact information, financial information, investment objectives, account information, tax information, or other personal data)
 - Information relating to transactions, advisory services, or investment activity
 - Information received from custodians, broker-dealers, financial institutions, administrators, or service providers
 - Information received in connection with strategic advisory engagements, investment diligence, private market transactions, or institutional advisory activities
 - Information received through meetings, communications, presentations, diligence materials, financial models, or third-party data rooms
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HOW INFORMATION IS USED

The Adviser uses information solely for legitimate business, advisory, operational, compliance, and regulatory purposes, including:

- Providing investment advisory and strategic consulting services
- Maintaining client relationships and records
- Evaluating investment opportunities and strategic initiatives
- Communicating with clients and counterparties
- Facilitating operational and administrative activities
- Complying with legal, regulatory, tax, and recordkeeping obligations
- Managing cybersecurity, compliance, and risk oversight functions

INFORMATION SHARING

The Adviser does not sell client information or confidential information to third parties and does not disclose non-public personal information for marketing purposes.

The Adviser may disclose information only as reasonably necessary to provide requested services, administer the advisory relationship, protect client or Firm interests, or comply with applicable law. Recipients may include, as applicable:

- Qualified custodians
- Broker-dealers
- Fund administrators
- Technology vendors
- Cloud service providers
- Compliance consultants
- Legal, accounting, or tax professionals, but only to the extent client information is necessary for the engagement
- Other service providers supporting the Adviser's operations

The Adviser may also disclose information:

- As required by law, regulation, subpoena, or legal process
- In connection with regulatory examinations or investigations
- With the client's affirmative authorization or consent where required

Third-party service providers that receive protected information are subject to appropriate confidentiality, security, and vendor-oversight expectations. The Adviser seeks to limit disclosures to information reasonably necessary for the applicable purpose.

MASSACHUSETTS PRIVACY AND AFFIRMATIVE CONSENT

For Massachusetts clients, the Adviser will not disclose non-public personal information to an unaffiliated third party unless the disclosure is required or otherwise permitted by

applicable law, or the client has affirmatively consented to the disclosure where such consent is required.

Where affirmative consent is required, the Adviser will obtain a written or otherwise legally valid authorization before making the disclosure. The authorization will identify or describe the recipient or category of recipient, the information or category of information that may be disclosed, and the purpose of the disclosure. The Adviser will retain the authorization in its records.

The Adviser does not rely on a client's failure to opt out as affirmative consent. A client may decline to provide an authorization that is not necessary to deliver the requested advisory service, and may revoke a previously granted authorization prospectively by providing written notice to the Adviser, subject to applicable law and contractual obligations.

Current unaffiliated service providers that may process or receive limited client information in the ordinary course include Charles Schwab & Co., Inc. for custody and brokerage; Microsoft for business email; Airtable for customer relationship management; Intuit QuickBooks for limited billing and accounting records; and Webflow for basic website/contact-form information. The Adviser uses McAfee for cybersecurity protection but does not intentionally provide McAfee with client non-public personal information. Scapin & Pina, P.C. is retained solely for the Adviser's corporate books and taxes and does not receive client non-public personal information in the ordinary course.

The Adviser may engage additional service providers in the future. Before providing client non-public personal information to a new unaffiliated provider, the Adviser will evaluate the purpose of the disclosure, the information involved, applicable privacy requirements, the provider's safeguards, and whether affirmative client consent is required.

CONFIDENTIAL PRIVATE MARKET AND STRATEGIC INFORMATION

In connection with private markets advisory and strategic consulting engagements, the Adviser may receive confidential business information, diligence materials, transaction-related information, financial models, and other non-public information.

The Adviser maintains policies and procedures reasonably designed to:

- Protect confidential information
- Limit unauthorized access or dissemination
- Safeguard electronic and physical records
- Prevent misuse of material non-public information

The Adviser does not use confidential information for improper purposes or in violation of applicable securities laws.

INFORMATION SECURITY AND CYBERSECURITY

The Adviser maintains administrative, technical, and physical safeguards reasonably designed to protect information from unauthorized access, misuse, alteration, or destruction.

Safeguards may include:

- Secure email and cloud-based systems
- Password protection and access controls
- Secure document storage and file-sharing practices
- Use of reputable third-party technology providers
- Clients are encouraged not to transmit Social Security numbers, passwords, full account numbers, or similarly sensitive information through ordinary email or public website contact forms, and to use secure communication methods when available.
- Vendor oversight and cybersecurity awareness practices

The Adviser also maintains procedures reasonably designed to respond to cybersecurity incidents and operational disruptions.

ELECTRONIC COMMUNICATIONS

The Adviser may communicate electronically with clients, counterparties, and service providers.

While the Adviser employs reasonable safeguards, electronic communications and internet-based systems may involve inherent security risks beyond the Adviser's control.

Clients are encouraged to use secure communication practices when transmitting sensitive information.

RETENTION OF INFORMATION

The Adviser retains information only as long as reasonably necessary to:

- Provide services
- Comply with legal and regulatory obligations
- Maintain required books and records
- Resolve disputes or enforce agreements

Records are maintained in accordance with applicable regulatory retention requirements.

FORMER CLIENTS AND PROSPECTIVE CLIENTS

The Adviser maintains the same standards of confidentiality and protection for former clients and prospective clients as for current clients.

CHANGES TO THIS POLICY

The Adviser may update this Privacy Policy from time to time to reflect:

- Regulatory developments
- Operational changes
- Technology enhancements
- Business activities

Material changes will be communicated as required by applicable law.

CONTACT INFORMATION

If you have questions regarding this Privacy Policy, please contact:

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