



## Privacy Policy

This notice is delivered to all clients and prospective clients of Radix Financial LLC and Radix Financial Cayman LLC (together "RADIX"), in accordance with federal law, to help you understand what information we collect, how we use it, and how we protect your personal information.

We recognize that our relationships with current and prospective clients are based on integrity and trust. RADIX will not disclose your personal information to any third parties unless it is required by law or at your direction, including for marketing/promotional purposes. **We will not sell your personal information.**

### What Information We Collect and Maintain

We collect "nonpublic personal information" ("NPI") about you that is either provided to us by you or obtained by us with your authorization:

- Information about your identity, which may include but is not limited to: your name, address, social security/tax id number, date of birth, nationality and passport information; banking information; net worth; financial account numbers and/or balances; and sources of income.
- Information that we collect or generate to service your financial needs, which might include information relating to your contact information, emails (and related data), call recordings, SMS text messages, website usage data, etc.
- Information that we may receive from third parties obtained for the purpose of RADIX's know-your-client procedures (which include anti-money laundering procedures, counter-terrorist and proliferation financing procedures, politically-exposed-person checks, sanctions checks, etc.), information from public websites and other public sources, and information received from the applicant's advisers or from intermediaries.

The NPI data collected and maintained by RADIX will, in all cases: (1) be for a lawful purpose directly related to the services we provide you; (2) be necessary for, or directly related to the ongoing services we provide you; and (3) be adequate but not excessive in direct relation to the services we provide to you.

### What Information We Disclose

Investment Advisors are permitted by law to disclose nonpublic information about you to unaffiliated third parties in certain circumstances. RADIX may disclose client's NPI: (1) to individuals and/or entities not affiliated with RADIX, including, but not limited to third-parties that assist in the supervision or management of your account(s) (i.e., sub-advisers, account custodian, attorney, etc.); (2) to service providers contracted by us in order for us to perform the duties in furtherance of the client's engagement with RADIX (i.e. client management systems, archiving technology vendors, cloud service providers, etc.); (3) to your authorized representative or power of attorney; (4) when we receive your prior consent; (5) in connection with a proposed or actual sale, merger, or transfer of all or a portion of our business; and (6) as otherwise permitted to do so in accordance with the parameters of applicable Cayman Islands, BVI, and US federal and/or state law. In the unlikely event that RADIX has a change to its client Privacy Policy that would allow it to disclose non-public information not covered under applicable law, RADIX will allow its clients the opportunity to "opt-out" of such disclosure.

### How We Protect Your Personal Information

We maintain commercially reasonable physical, electronic, and procedural safeguards to protect your personal information in accordance with US federal law, the Data Protection Act of the Cayman Islands, and the Data Protection Act of the British Virgin Islands. We restrict and limit access to client information only to those who need to carry out their business functions. We safeguard client information by preventing its unauthorized access, disclosure, or use. We also prohibit your NPI from being used as content to train large language generative AI models, and maintain physical, electronic, and procedural safeguards to protect your confidential personal information. Arrangements with companies or independent contractors not affiliated with RADIX will be subject to confidentiality agreements.

### Former Clients

Even if we cease to provide you with financial services, our Privacy Policy will continue to apply to you, and we will continue to treat your nonpublic information with strict confidentiality. We maintain all records regarding all former clients for at least 5 years or as otherwise required by applicable law.

### Contact Us

Clients are encouraged to discuss any questions regarding privacy policies and procedures directly with Amy Hubble, Chief Compliance Officer at [amy@radixfinancial.com](mailto:amy@radixfinancial.com).