

PRIVACY POLICY

RISE Investment Management, LLC (“RISE,” “we” or “us”) is committed to safeguarding the personal information that you provide to us. This Privacy Policy describes how we handle and protect the personal information we collect about individuals who use our website, www.riseinvestmentsusa.com (our “Website”), applications or services. If you have any questions that this policy does not address, please contact us at clientservice@riseinvestmentsusa.com or (440) 655-8807.

Investment Advisory firms collect certain personal information from individuals. They choose how they share your personal information. Federal law gives you as our client the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

This policy applies to information we collect:

- On our Website
- In mail, text, phone calls, in-person meetings and all other forms of electronic communication between you and the Firm.
- When you interact with our advertising and applications on third-party websites and services, if those applications or advertising include links to this policy.

By using our services, you consent to our collection and use of information as explained in this Policy and agree to be bound by our Terms of Use. Please note that if you choose to enter an investment advisory agreement with RISE, you may be required to agree to a separate agreement, including, but not limited to, new or additional privacy notices or terms of use.

This Privacy Policy applies to the following entities:

- RISE Investment Management, LLC

Collection of Information

RISE collects non-personally identifiable information from you regarding your usage of our Website (“Non-Personally Identifiable Information”). Non-Personally Identifiable Information may include, without limitation, website pages viewed, articles, presentation and videos viewed, time spent using certain features of the Website, demographic data such as server locations, cookies existing on your computer, search criteria used and results, date, time, connection speed, and other information which does not specifically identify you. We collect this information using various technologies, including, but not limited to, cookies and server logs. “Cookies” are pieces of information that may be placed on your computer by a website for the purpose of facilitating and enhancing your communication and interaction with that website. For instance, when we use a cookie to identify you, you would not have to log in a password more than once, thereby saving time while on our site. Cookies can also enable us to track and target the interests of our users to enhance the experience on our site. Usage of a cookie is in no way linked to any personally identifiable information on our site. “Server logs” can be either a single log file or several log files automatically created and maintained by a server of activity performed by the server, which can include information about any transaction you conduct with the server.

Some of our business partners may use cookies on our site (for example, advertisers). However, we have no access to or control over these cookies.

What We Collect

RISE collects personal information about you in connection with our providing financial services to you. We may collect all information that you send to us or that we collect elsewhere but use in this Website or in providing services to you. This information includes (1) contact information such as your IP address,

email address, name, phone number, date of birth and age, (2) financial information such as tax status, billing address, banking information, money transfers, declared investor profile, origin of funds, credit card information, Social Security number and/or taxpayer identification number, assets and income, credit history, wire transfer instructions, and debts and expenses, and (3) profile information such as home address, interests, education, employment, function, employer, remuneration, marital status, gender or household income level. (“Personally Identifiable Information” and collectively with the Non-Personally Identifiable Information, the “Data”).

How We Collect It

RISE collects this information from you through various means, including through this Website, such as when you provide or upload information to the Website, sign up for an account, enter into a financial advisory agreement with RISE, verify your identity, provide answers to questionnaires or surveys, fill in responses to blank forms, provide payment instructions or send us an email. RISE also collects this information from your transactions with us, such as your account balance and account usage, and from others, such as the Internal Revenue Service, credit reporting agencies, and non-affiliate companies. Although we do not currently have any affiliated or non-affiliated companies, information may be collected through affiliate companies or non-affiliate companies, should we ever have them. We may also collect and store information, which could include Non-Personally Identifiable Information or Personally Identifiable Information, locally on your computer or device using mechanisms such as browser web storage or application data caches.

RISE may collect information on persons other than individuals who use our Website, applications or services. This may happen for instance when your employer provides us with information about you or your contact details are provided by one of our clients if you are, for example: co-borrowers / guarantors, legal representatives (power of attorney); beneficiaries of payment transactions made by our clients; beneficiaries of insurance policies and trusts; ultimate beneficial owners; clients’ debtors (e.g. in case of bankruptcy); company shareholders, board members and other contact persons for our ‘Know Your Customer’ (KYC) check; representatives of a legal entity (which may be a client or a vendor); advisory persons (e.g. consultants, custodians and lawyers); and staff of service provider and commercial partners.

We use analytics programs and service providers that can use first-party cookies to report on your interactions with the RISE Website. These programs collect information including, but not limited to, the time of each of your visits to the RISE Website, whether you have visited the RISE Website before, what site referred you to the RISE Website, and what pages you viewed on the RISE Website.

Third-Parties

This Privacy Policy does not cover the collection of information by cookies or other methods by third parties, such as our business partners. We do not control how such third parties collect information or by what means as such third parties may use their own cookies to collect information about you. Third parties may track you and collect and store information across websites.

Do-Not-Track (DNT) Signals

RISE does not track its customers over time and across third party websites to provide targeted advertising and therefore does not respond to Do Not Track (DNT) signals. However, some third-party sites do keep track of your browsing activities when they serve you content, which enables them to tailor what they present to you.

Use of Information

RISE uses the Data you provide in a manner that is consistent with this Privacy Policy. If you provide Data for a certain reason, we may use the Data in connection with the reason for which it was provided. For instance, if you contact us by email, we will use the Data you provide to answer your question or resolve your problem. Also, if you provide Data in order to obtain access to our services, we will use your Data to provide you with access to such services and to monitor your use of such services. We also may obtain information about you from third-party sources to verify your identity so we can properly process your requests and prevent fraud.

RISE will use your Data (1) to market our products and services to you, (2) to provide services and products requested by you, (3) to enable our vendors and contractors to provide and assist us in the marketing, operation, troubleshooting and analysis of our Website and other services, (4) to meet any regulatory requirements for the offer or sale of securities required by law, rules or regulations to our affiliates or members, (5) to engage in any other lawful activities we believe are consistent with the foregoing, and (6) to protect against legal liability. We may provide any of these services through third-parties, which may necessitate sharing your Data with them. We require third-party service providers and financial institutions with which we have joint marketing arrangements to protect the confidentiality of your information and to use the information only for the purposes for which we disclose the information to them.

RISE may also use your Data collected through the Website to help us improve the content and functionality of the Website, to better understand our users and to improve our services. RISE may use this information to communicate with you regarding our services or to tell you about services we believe will be of interest to you. If at any time you wish not to receive any future marketing communications or you wish to have your name deleted from our mailing lists, please contact us as indicated below. Note however that as a user of our service we will send you administrative communications that are reasonably necessary.

If RISE intends on using any Data in any manner that is not consistent with this Privacy Policy, you will be informed of such anticipated use prior to or at the time at which the Data is collected.

Our Disclosure of Your Data and Other Information

We will share your personal information with third parties only in the ways that are described in this Privacy Policy. We consider this information to be a vital part of our relationship with you. There are, however, certain circumstances in which we may share your Data with certain third-parties without further notice to you, as set forth below:

Business Transfers: As we develop our business, we might sell or buy businesses or assets. In the event of a corporate sale, merger, reorganization, dissolution or similar event, your Data may be part of the transferred assets and you will be notified via email and/or a prominent notice on our Website of any change in ownership or uses of your personal information, as well as any choices you may have regarding your personal information.

Related Companies: While we do not currently have any Affiliated Companies. Should we ever have any Affiliated Companies in the future, we may also share your Personal Data with our Affiliated Companies for purposes consistent with this Privacy Policy.

Agents, Consultants and Related Third-Parties: RISE, like many businesses, sometimes hires other companies to perform certain business-related services. Examples of these services from such third parties, companies, or individuals, may include ID verification, accreditation/financial/credit verification, electronic document signing, payment storing and processing, sending postal mail and e-mail, escrow services, disbursement of funds, analyzing data, providing marketing assistance, and providing customer

service. As such, these third parties, companies, or individuals may have access to your Data. These companies are authorized to use your personal information only as necessary to provide these services to us.

Legal and Regulatory Requirements: RISE may disclose your Data if required to do so by law or in the good faith belief that such action is necessary to (i) comply with a legal or regulatory obligation, (ii) protect and defend the rights or property of RISE, (iii) act in urgent circumstances to protect the personal safety of users of the Website or the public against fraud or other harm, or (iv) protect against legal liability.

These sharing practices are consistent with Federal privacy and related laws, and in general, you may not limit our use of your personal information for these purposes under such laws. We note that the Federal privacy laws only give you the right to limit the certain types of information sharing that we do not engage in (e.g., sharing with our affiliates certain information relating to your transaction history or creditworthiness for their use in marketing to you, or sharing any personal information with nonaffiliates for them to market to you).

Your Choices

If your personal information changes, or if you no longer desire our service, you may correct, update, amend, delete or request deletion by making the change in your registered account settings page, by emailing our Customer Support at clientservice@riseinvestmentsusa.com or by contacting us at the contact information listed below.

We will retain your information for as long as your account is active or as needed to provide you services. We will retain and use your information as necessary to comply with our legal and regulatory obligations, resolve disputes, and enforce our agreements.

When you sign up for our services, we may send periodic emails to you regarding our services or to tell you about services we believe will be of interest to you. If you prefer not to receive such marketing or promotional e-mails from us, you may unsubscribe completely by emailing us at clientservice@riseinvestmentsusa.com.

Please note that opt-out requests may take up to two (2) weeks to process. Please also note that at times we may need to send you e-mail communications that are transactional in nature such as service or termination announcements or payment confirmations which are communications you will not be able to opt-out of.

RISE does not and will not sell any of your Personally Identifiable Information to any third-party for purposes of advertising, soliciting, or telemarketing.

Third-Party Websites and Services

The RISE Website may contain links to other Websites and services not maintained by RISE. In addition, other Websites and services may also reference or link to the RISE Website. We encourage you to be aware when you enter or leave our Website, or surf the Internet, and to read the privacy statements of each Website and service that you visit. We do not endorse, screen, or approve, and are not responsible for the privacy practices or the content of, other websites or services.

Messaging

The RISE Website may permit users to communicate with companies and other users posting information on the Website. We may read, collect and analyze information transmitted between users for regulatory

compliance and marketing purposes. RISE assumes no liability or responsibility for any errors or omissions in the content of its Website.

Exclusions

This Privacy Policy does not apply to any Data collected by RISE other than Data collected through the RISE Website or Data provided by you in connection with services provided to you by RISE. This Privacy Policy shall not apply to any unsolicited information you provide to RISE through its Website or through any other means. This includes, but is not limited to, information posted to any public areas of the Website, any ideas for new products or modifications to existing products, and other unsolicited submissions (collectively, "Unsolicited Information"). All Unsolicited Information shall be deemed to be non-confidential and RISE shall be free to reproduce, use, disclose, distribute and exploit such Unsolicited Information without limitation or attribution.

Blog

Our Website may offer a publicly accessible blog. You should be aware that any information you provide in these areas may be read, collected, and used by others who access them. To request removal of your personal information from our blog, contact us at clientservice@riseinvestmentsusa.com we may not be able to remove your personal information, in which case we will let you know if we are unable to do so and why.

Social Media Features

Our Website may include social media features such as the Facebook "Like" button, Twitter, and other "share this" buttons. These features are interactive mini-programs and may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the feature to function properly. Social media features and widgets are either hosted by a third party or hosted directly on our Website. Your interactions with these features are governed by the privacy policy of the company providing it.

Security

To protect your personal information from unauthorized access and use, we use security measures that comply with Federal law. These measures include computer safeguards and secured files and buildings. We use reasonable efforts to secure access to Personally Identifiable Information in our possession, but will not be liable for any failure to safeguard such information, whether inadvertent or otherwise. Personally Identifiable Information is also stored with third-parties who have informed us that they also use reasonable efforts to secure access to Personally Identifiable Information, but we will not be liable for the failure of any third party to safeguard Personally Identifiable Information, whether inadvertent or otherwise.

Wherever appropriate, we obfuscate and/or encrypt information in our systems and/or during information transfer; however, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, we cannot guarantee its absolute security.

It is important for you to protect against unauthorized access to your password and to your computer. Be sure to log off when finished using a shared computer.

Children's Privacy Policy

The RISE Website is not intended for use by children. No one under eighteen (18) years of age is allowed to use the site, provide any personal information or receive our email distributions. We do not knowingly solicit or collect Personally Identifiable Information from children or teenagers under the age of thirteen

(18). If you believe that a minor has disclosed Personally Identifiable Information to RISE, please report this to us immediately by emailing us at clientservice@riseinvestmentsusa.com.

California Privacy Rights

California Civil Code Section § 1798.83 permits users of our Website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email to clientservice@riseinvestmentsusa.com.

Changes to This Privacy Notice

We reserve the right, in our sole discretion, to change, modify, add, or remove portions of this Policy at any time. Any changes or updates will be effective immediately upon posting to the Website and sending a notification to all registered users via email regarding such update. You should review this notice regularly for changes, and can determine if changes have been made by checking the Effective Date below. Your continued use of our Website following the posting of any changes to this notice means you accept such changes.

Applicable Law and Jurisdiction

The RISE Website is maintained in the United States of America. By accessing the RISE Website, you consent to and authorize the export of Personally Identifiable Information to the United States of America and its storage and use as specified in this Privacy Notice.

This Privacy Notice shall be governed by, construed and entered in accordance with the laws of the State of Illinois applicable to contracts deemed to be made within such state, without regard to choice of law or conflict of law provisions thereof. All disputes with respect to this Privacy Notice shall be brought and heard either in the Illinois State Courts located in the county of Cook, Illinois, or the federal district court for the Northern District of Illinois. You consent to the in personam jurisdiction and venue of such courts.

YOU HEREBY WAIVE YOUR RIGHT TO A TRIAL BY JURY WITH RESPECT TO ANY CLAIM, ACTION OR PROCEEDING, DIRECTLY OR INDIRECTLY, ARISING OUT OF, OR RELATING TO, THIS AGREEMENT TO THE FULLEST EXTENT PERMITTED BY LAW.

Effective Date

This Privacy Policy was last updated on January 20, 2025.