

**PRIVACY POLICY**  
Last Updated: February 16, 2024

Repool, Inc. (“Repool,” “we,” “us,” or “our”), knows that privacy is very important to you. We have created this privacy policy (the “Privacy Policy”) to describe what kinds of personal information we may obtain through:

- Our website located at [www.repool.com](http://www.repool.com) (the “Site”);
- Our web application located at [app.repool.com](http://app.repool.com) (“Web Application”);
- Any other Repool owned website, web application, or digital property that links to this Privacy Policy; and
- When you interact with us in any other way.

By accessing or using the Site, the Web Application, or any other website, web application, or digital property links to this Privacy Policy (collectively, the “Digital Properties”), you can access our interactive platform (the “Platform”), use our fund formation and administrative services as our valued client (“Client”), launch pooled investment vehicles (each, a “Fund”), and onboard investors/limited partners (“Investors”) to a Fund(s), or otherwise interface with Repool and/or its Clients through our Digital Properties (collectively with the foregoing, the “Services”). Our Services are only available to individuals aged 18 or older.

By accepting this Privacy Policy, accessing or using the Digital Properties, the Services, or otherwise manifesting your assent to this Privacy Policy, you agree to be bound by this Privacy Policy and the accompanying Repool [Terms of Use](#), which together make up the Agreement. If you do not agree to (or cannot comply with) all of the terms of this Privacy Policy or any other terms of the Agreement, you may not access or use the Services. Capitalized terms not defined in this Privacy Policy shall have the meaning set forth in our [Terms of Use](#).

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## **I. The Information We Collect**

We may collect or receive the following types of information from or about visitors to our Digital Properties (“Visitors”), Clients, and/or Investors, which may include personal information.

### **a. Contact Information**

We collect contact information through our Digital Properties and Services, which typically includes name, email address, phone number, and any information provided in messages to us (“Contact Information”). We use Contact Information for purposes such as providing information about the Services and Funds, responding to your inquiries, opening accounts for Investors, sending you email alerts (including marketing emails), or providing the Services.

### **b. Payment Information**

In order to purchase the Services, you may be required to provide our third party payment processor(s) such as Stripe (“each a “Payment Processor”) with certain credit or debit card information, ACH transfer information or wiring instructions (collectively, the “Payment Information”). We do not obtain access to the Payment Information. Our Payment Processor(s) will collect on our behalf information about your payment for Services (“Transaction Information”). By using the Services, you acknowledge and agree that if and to the extent your Payment Information, Transaction Information, and/or any other information is collected by or transferred to Stripe, or any other Payment Processor, such information will be governed by its applicable privacy policy, and that you expressly agree to the terms of such privacy policy. You hereby expressly grant us the right, power, and authority to access and transmit your information as reasonably necessary for the Payment Processor(s) to provide its services to you in connection with your use of our Services.

### **c. Client and Fund Information**

In the course of providing the Services, we collect additional information regarding our Clients, Funds, and/or related Investors, including, but not limited to, (i) information and documentation necessary for the formation of entities relating to a pooled investment vehicle and the generation of fund-related operative agreements, such as private placement memorandums, subscription questionnaires and agreements, limited liability company or limited partnership operating agreements, and/or other disclosure or governing documents, as applicable; (ii) personal information and documentation of persons relating to Clients, Funds, and/or related Investors, such as full legal name, date and place of birth, occupation, proof of place of business, tax identification number, drivers license number and scan, passport number and scan, certificate of formation, and/or other sensitive, identifying information and documentation; (iii) contact information such as phone number, mobile phone number, email, and personal and/or business address, as applicable. Such information is necessary for us to provide our Services including, but not limited to, know-your-customer and anti-money laundering related compliance and reporting, providing various administrative and accounting services to our Clients, and more.

### **d. Investor Account Information**

Clients may refer prospective Investors, with whom they have previously established a relationship, to our Digital Properties for the purpose of viewing information about the Client’s Fund(s) by providing a customized link. Investors may also choose to open an account (“Account”) with Repool by providing their name and email address. Account holders may receive investment information regarding the Fund(s) via email and/or via the Digital Properties.

If an Investor decides to invest in a Fund, additional information is required, such as full legal name, date and country of birth, nationality, passport numbers (or numbers associated with other government issued identification), financial information, bank account and payment card details, account balances, credit scores, tax information, citizenship status, Social Security Number or Tax ID, education, gender, interests, photo, occupation, employment status, employer name and address, marital status, suitability information, personal income and other sources of funds, net worth, trusted contact information, and other information about the Investor's financial situation, investment experience, and risk preferences. Investors will be required to acknowledge certain disclosures and, pending final approval by the applicable Client, enter into various agreements with the Client which may include, but are not limited to, operating agreements and subscription agreement(s) (collectively, "Investor Agreements"). Investor Agreements may be furnished to Clients by the Fund, or by Repool on behalf of the Fund. Without exception, Investor Agreements are strictly between the Client, the Fund(s) and the Investors; Repool is not a party to any Investor Agreements and assumes no obligations, duties, or liabilities related to or arising from any Investor Agreement. That any given Fund is a Repool Client is in no way an endorsement by Repool of any Client or their affiliates, nor of their investment strategy, adherence to applicable law(s), likelihood of generating positive returns, suitability for any given Investor, or any other acts or communications of any kind by any given Client or Fund.

**e. Information obtained automatically from online activity**

When Visitors, Clients or Investors access or use our Digital Properties or use the Services, we may automatically collect certain information sent to us by the person's computer, mobile device, tablet, or any other device.

We automatically receive standard technical information when you visit the Digital Properties or use the Services through browser cookies, pixels, web server logs, web beacons, and similar technologies (collectively, "Tracking Technologies"). The information collected enable us to personalize your experience with the Digital Properties and the Services, understand how you use them, maintain a persistent session, and improve and further develop our Platform. Cookies, for example, are small packets of data that a website stores on your computer's hard drive so that your computer will "remember" information about your visit. In addition to collecting information, we use cookies to help us authenticate users, provide content of interest to you, analyze which features you use most frequently, and measure and optimize advertising and promotional effectiveness. To do this, we may use both session cookies, which expire once you close your web browser, and persistent cookies, which stay on your computer until you delete them. If you do not want cookies placed on your hard drive, you may be able to turn that feature off on your computer or mobile device. Please consult your internet browser's documentation for information on how to do this. However, if you decide not to accept cookies or other Tracking Technologies, the Digital Properties or the Services may not function properly. When access to the Digital Properties or the Services are made available to you through third-party sites, please be aware that these other sites maintain their own policies regarding Tracking Technologies and the collection and use of information. You are responsible for reviewing those policies.

We may also automatically collect other information when you access or use the Digital Properties or the Services such as (i) information about the device used (e.g., the type of device, the advertising identifier ("IDFA" or "AdID")), the operating system and version (e.g., iOS, Android or Windows), carrier and network type (e.g., WiFi, 3G, 4G, LTE); (ii) IP addresses (which may consist of a static or dynamic IP address and will sometimes point to a specific identifiable computer or device); (iii) browser type and language; (iv) referring and exit pages and URLs; (v) date and time of access; (iv) the content viewed; (v) the amount of time spent on particular pages; (vi) what features of the Digital Properties or Services are used or visited; (vii) details of any purchases; (viii) click stream information; and (ix) precise geolocation

data. We may also evaluate your computer, mobile phone, or other access device to identify any malicious software or activity that may affect the availability of the Digital Properties or the Services.

**f. Geolocation information**

To provide access to the Digital Properties or the Services while you are using an electronic device, we automatically collect geolocation information from your mobile device, your wireless carrier, or certain third-party service providers (“Geolocation Information”). Collection of such Geolocation Information occurs only when the Digital Properties or the Services are running on your mobile device. You may control the collection of Geolocation Information through the user settings on your device. You may decline to allow us to collect such Geolocation Information, in which case we may not be able to provide access to the Digital Properties or certain Services to you. Please be sure to manage your mobile device and privacy preferences on the Platform on an ongoing basis.

**g. Information obtained from other sources, including our social media pages**

In addition to collecting Personal Information from and about Clients, Investors and Visitors through our Digital Properties and the Services, we may collect Personal Information when you visit, use, or access the Digital Properties or the Services from third-party websites or apps. We will do so in accordance with the terms of use and privacy policies of the third-party websites and apps, and applicable law. This includes our social media pages on third-party services such as Instagram, Twitter, LinkedIn, and Facebook. For example, we may collect the information you shared on our social media pages through an application or form, which will have a link to this Privacy Policy. Personal Information may also be collected by the third-party social media sites that host our social media pages. These sites may provide aggregate information and analysis to us about their visitors’ use of our social media pages. This allows us to better understand and analyze our user growth, general demographic information about the users of these pages, and interaction with the content that we post. This Privacy Policy does not cover Personal Information collected by such third-party social media sites. For more information on their privacy and security practices please review the privacy policies and terms of use on their respective websites and apps.

**h. Information obtained from third-party analytics services**

We use third-party analytics services (such as Google Analytics, FullStory, and/or LogRocket) to evaluate your access and use of the Digital Properties and the Services, compile reports on activity, collect demographic data, analyze performance metrics, and collect and evaluate other information relating to device and internet usage. These third party analytics services use cookies and other Tracking Technologies to help analyze and provide us the data. By accessing or using the Digital Properties and/or the Services, you consent to the processing of data about you by these analytics providers in the manner and for the purposes set out in this Privacy Policy. The information used by such analytics services is generally at the aggregate level. Google may associate such data with visitation information collected from our Digital Properties.

We may change these third-party analytics services from time to time. For more information on our analytics services, including how to opt out from certain data collection, please visit the sites below. Please be advised that if you opt out of any service, you may not be able to use the full functionality of the Digital Properties or the Services. If you have any questions, or to request a current list of our third-party analytics services, please contact us as set forth in Section XII.

- For Google Analytics, please visit [here](#) and [here](#)
- For FullStory, please visit [here](#)
- For LogRocket, please visit [here](#)

- For Hubspot, please visit [here](#)

## **II. Information Use and Sharing**

We use and share your Personal Information as set forth below:

- To analyze usage of our Digital Properties;
- To improve our Platform and the Services;
- To deliver to our Clients and their Fund Investors any administrative notices, alerts, and communications relevant to Client’s use of the Services;
- To fulfill requests for certain products and services;
- For market research, project planning, troubleshooting problems, and detecting and protecting against error, fraud, or other criminal activity;
- To third-party contractors and service providers that provide services to us in the operation of our business including supporting our Digital Properties, servicing Accounts and providing other Services such as broker/dealers, digital account service providers, brokerage services, custodial services, administrators, payment processors, customer service organizations, IT and cloud service providers, among others;
- To enforce our Terms of Use;
- To disclose aggregated, anonymous, user statistics and other information to (i) affiliates, agents, business partners, and other third parties; (ii) describe the Digital Properties and/or the Services to current and prospective business partners; and (iii) other third parties for lawful purposes;
- To receive assistance from third-party advertisers and remarketers for the purpose of tailoring, analyzing, managing, reporting, and optimizing advertising you see on our Digital Properties and elsewhere;
- To share some or all of your information with our parent company and affiliates;
- As required by law, such as to comply with a subpoena, or similar legal process, and when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request;
- As we develop our businesses, we may be involved in a corporate sale, merger, reorganization, sale of assets, dissolution, investment, or similar corporate event and we expect that your Personal Information will be part of the transferred assets; and
- Otherwise with your consent.

We will take reasonable measures to require that any party receiving any of your Personal Information from us undertakes to: (i) retain and use such information only for the purposes set out in this Privacy Policy; (ii) not disclose your personal information except with your consent, as permitted by law, or as permitted by this Privacy Policy; and (iii) generally protect the privacy of your Personal Information.

## **III. Access, Choice, and Retention of Personal Information**

If the Personal Information we have for you changes, Clients and Investors may correct or update it by contacting us as set forth in Section XII of this Privacy Policy. Investors may also be able to correct or update some of their personal information directly in their Account.

You may manage your receipt of marketing and non-transactional communications by clicking on the “unsubscribe” link located on the bottom of any of our marketing emails. Please note that Investors cannot opt out of receiving transactional e-mails related to their Accounts. If you are part of our text messaging program, you can opt out of receiving marketing and non-transactional messages by texting “STOP” in response.

We will use commercially reasonable efforts to process all such requests in a timely manner. You should be aware, however, that it is not always possible to completely remove or modify information in our databases. Additionally, we will retain and use your information (or copies thereof) as necessary to comply with our legal and/or regulatory obligations, resolve disputes, and enforce our agreements.

#### **IV. External Websites and Third Parties**

Certain Services offered through the Platform are provided by independent third parties selected by Clients, such as brokerage services. These services are not affiliated with Repool, and do not make recommendations or offer investment, financial, legal or tax advice. If you would like additional information regarding these independent third parties, please contact the applicable Client or Fund Manager directly.

Unless explicitly stated otherwise, our Privacy Policy addresses only our use and disclosure of information we collect from and/or about you in your interactions with Repool. If you disclose information to third parties, the use and disclosure restrictions contained in this Privacy Policy will not apply, as we do not control the privacy policies of such third parties, nor are we subject to them. For more information on the privacy practices of any third parties that you elect to use, please visit their respective privacy policies and terms of use for information relating to your use of their services.

The Digital Properties may also contain links to other third-party websites or apps (“Other Properties”). We have no control over the privacy practices or the content of any of our business partners, advertisers, sponsors, or Other Properties to which we provide links. As such, we are not responsible for the content or the privacy policies of those Other Properties. You should check the applicable third-party privacy policy and terms of use when visiting any Other Properties.

#### **V. Security**

We follow commercially reasonable and generally accepted standards to protect the Personal Information submitted to us, both during transmission and once we receive it. Please understand, however, that no method of transmission over the internet, or method of electronic storage, is 100% secure. Therefore, we cannot guarantee its absolute security. If you have any questions about security regarding our Digital Properties or the Services, please contact us.

#### **VI. Children’s Privacy**

Our Services are only available to individuals aged 18 or older, and we do not knowingly collect Personal Information from any person under the age of 18. If an individual under the age of 18 has provided us with Personal Information, a parent or guardian of that child may contact us and request that such information be deleted, and we will endeavor to delete that information from our databases.

#### **VII. Do Not Track**

As discussed above, third parties such as advertising networks and analytics providers may collect information about your online activities over time and across different websites when you access or use the Digital Properties or the Services. Currently, various browsers offer a “Do Not Track” option, but there is no standard for commercial websites. At this time, we do not monitor, recognize, or honor any opt-out or do not track mechanisms, including general web browser “Do Not Track” settings and/or signals.

### **VIII. Notice to California Residents**

Pursuant to Section 1798.83 of the California Civil Code, residents of California have the right to obtain certain information about the types of personal information that companies with whom they have an established business relationship (and that are not otherwise exempt) have shared with third parties for direct marketing purposes during the preceding calendar year, including the names and addresses of those third parties, and examples of the types of services or products marketed by those third parties. If you wish to submit a request pursuant to Section 1798.83, please contact us via email at [legal@repool.com](mailto:legal@repool.com).

### **IX. Notice to Nevada Residents**

We do not sell your personal information as defined under Nevada law. Nonetheless, if you are a resident of Nevada, you have the right to opt-out of the sale of certain Personal Information to third parties. You can exercise this right by contacting us at [legal@repool.com](mailto:legal@repool.com) with the subject line “Nevada Do Not Sell Request” and providing us with your name and the email address associated with your Account.

### **X. Important Notice to Non-U.S. Residents**

The Digital Properties and the Services are operated in the United States. If you are located outside of the United States, please be aware that any information you provide to us maybe transferred to, processed, maintained, and used on computers, servers, and systems located outside of your state, province, country, or other governmental jurisdiction where the privacy laws may not be as protective as those in your jurisdiction. If you are located outside the United States and choose to access or use the Digital Properties or the Services, you consent to any transfer and processing of your Personal Information in accordance with this Privacy Policy, and you do so at your own risk.

### **XI. Changes to this Privacy Policy**

This Privacy Policy is effective as of the date stated at the top of this Privacy Policy. We may update this Privacy Policy from time to time without notice to you. We will indicate at the top of this Privacy Policy when it was most recently updated, and we encourage you to revisit this page, <https://www.repool.com/legal/privacy>, periodically to stay aware of any changes. By accessing the Digital Properties or the Services after we change this Privacy Policy, you are deemed to have accepted such changes.

### **XII. Contacting Us**

If you have any questions about our Privacy Policy or privacy practices, or if you would like to exercise your rights and choices, please contact our Customer Service at [legal@repool.com](mailto:legal@repool.com) or write to us at:

Repool, Inc.  
169 Madison Ave, #2123  
New York, NY 10016