

GLOBAL PRIVACY NOTICE

Effective: January 1, 2026

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1. OVERVIEW

Two Prime Inc., and each of its affiliates (collectively, "Two Prime," "we," "us," "our") respect your privacy and are committed to protecting the personal data we hold about you. If you have questions, comments, or concerns about this Privacy Notice or our processing of personal data, please see the bottom of this Privacy Notice for information about how to contact us.

This Privacy Notice explains our practices with respect to the personal data we collect and process about you. This includes information we collect through, or in association with, our website located at <https://www.twoprime.com/>, our related social media sites, and our tools, products and services that we may offer via our website (the website, social media pages, tools, products and services, collectively, the "Services").

Two Prime's United Kingdom ("UK") representative and European Union ("EU") representative is DataRep. To contact DataRep, please visit: <https://www.datarep.com/data-request/>. This Privacy Notice further explains the manner in which Two Prime collects, uses, and maintains Personal Data of individuals based in the UK and the EU, as required under the General Data Protection Regulation 2016/679 ("GDPR") or the GDPR and the Data Protection Act 2018, as applicable.

Please review the following to understand how we process and safeguard personal data about you. By using any of our Services, whether by visiting our website or otherwise, and/or by voluntarily providing personal data to us, you acknowledge that you have read and understand the practices contained in this Privacy Notice. This Privacy Notice may be revised from time to time, so please ensure that you check this Privacy Notice periodically to remain fully informed.

2. PERSONAL DATA WE COLLECT

We collect information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household ("personal data"). In addition, we may collect data that is not identifiable to you or otherwise associated with you, such as aggregated data, and is not personal data. To the extent this data is stored or associated with personal data, it will be treated as personal data; otherwise, the data is not subject to this notice.

a. Categories of Personal Data We Collect

The types of personal data we collect about you depend on your interactions with us and your use of the Services. We collect the below categories of personal data from our users:

1. Identifier data, such as a real name, alias, online identifier, internet protocol address, email address, job titles, the company you work for or other similar identifiers.
2. Internet or other electronic network usage activity information, including, but not limited to, browsing history, search history, operating system, pages viewed, and the dates/times of your visits.
3. Marketing and communications data, including, but not limited to, your preferences in receiving marketing from us and your communication preferences.

We will not collect additional categories of personal data other than those categories listed above. If we intend to collect additional categories of personal data, an updated website privacy notice will be made available at or before the time of collection.

b. How We Use Your Personal Data

We collect and process your personal data for the following business and commercial purposes:

1. To provide and maintain our website and Services.
2. To provide information or respond to any requests or inquiries, or to provide customer service in connection with our website or our Services.
3. To provide marketing communications by email, including emails, newsletters, analyses and reports.
4. To identify any security incidents, and protect against malicious, deceptive, fraudulent, or illegal activity.
5. To debug, identify and repair errors that impair the provision of our Services.
6. To comply with applicable laws, regulations, rules and requests of relevant law enforcement and/or other governmental agencies, or for other purposes, as permitted or required by law.
7. As necessary or appropriate to protect the rights, property, and safety of our users, us, and other third parties.

We will not use the personal data we collected for materially different, unrelated, or incompatible purposes without providing you with notice and obtaining your consent.

c. How We Obtain Your Personal Data

We collect your personal data from the following categories of sources:

- Directly from you. When you provide it to us directly, whether online or by email.
- Automatically or indirectly from you. For example, through logging and analytics tools, cookies, pixel tags, and as a result of your use of and access to the Services.
- From Third Parties. For example, ad networks to serve advertisements across the Internet. These advertisers use cookies, pixel tags, and other tracking technologies to collect information about your online activity and provide online advertising targeted to you and your interests.

d. Legal Bases for Processing

We process personal data for, or based on, one or more of the following legal bases:

- Your Consent. We may process personal data with your consent, for example, to send marketing communications.
- Performance of a Contract. We may process personal data to enter into, or perform under, the agreement between us, for example, in order to provide or maintain our Services or to provide customer service in connection with our Services.
- Legitimate Interests. We may process personal data for our legitimate interests, for example, to respond to any requests or inquiries, to provide customer service in connection with our website or our Services, or to operate, maintain, and improve the quality and security of our Services.
- Compliance with Legal Obligations and Protection of Individuals. We may process personal data to comply with the law and our legal obligations, as well as to protect you and other individuals from certain harms.

e. To Whom We Disclose Your Personal Data

We disclose your personal data to the following categories of third parties:

- Our service providers so we can provide our Services to you.
- Our affiliated entities, including Two Prime Lending Ltd.
- Government agencies or regulators when required to do so by law; in response to a request from a law enforcement agency or authority or any regulatory authority; to protect the confidentiality or security of your personal data; and/or to protect against or prevent actual or potential fraud, unauthorized transactions, claims or other liabilities.

3. YOUR RIGHTS REGARDING PERSONAL DATA

You have certain rights regarding the collection and processing of personal data. You may exercise these rights, to the extent they apply to you, by contacting us using the information provided at the end of this Privacy Notice, or by following instructions provided in this Privacy Notice or in communications sent to you.

Your rights vary depending on the laws that apply to you, but may include:

- The right to know whether, and for what purposes, we process your personal data;
- The right to be informed about the personal data we collect and/or process about you;
- The right to learn the source of personal data about you we process;
- The right to access, modify, and correct personal data about you;

- The right to know with whom we have shared your personal data with, for what purposes, and what personal data has been shared (including whether personal data was disclosed to third parties for their own direct marketing purposes);
- The right to withdraw your consent, where processing of personal data is based on your consent; and
- The right to lodge a complaint with a supervisory authority located in the jurisdiction of your habitual residence, place of work, or where an alleged violation of law occurred.

a. Accessing, Modifying, Rectifying, and Correcting Collected Personal Data

We strive to maintain the accuracy of any personal data collected from you, and will try to respond promptly to update our records when you tell us the information in our records is not correct. However, we must rely upon you to ensure that the information you provide to us is complete, accurate, and up-to-date, and to inform us of any changes. Please review all of your information carefully before submitting it to us, and notify us as soon as possible using the contact details listed in this website privacy notice of any updates or corrections.

Depending on the laws that apply to you, you may obtain from us certain personal data in our records. If you wish to access, review, or make any changes to personal data you have provided to us through the Services, please contact us at the information provided at the end of this Privacy Notice. We reserve the right to deny access as permitted or required by applicable law.

b. Your California Privacy Rights

California's "Shine the Light" law, permits our users who are California residents to request and obtain from us a list of what personal data (if any) we disclosed to third parties for their own direct marketing purposes in the previous calendar year and the names and addresses of those third parties. Requests may be made only once per year per person, must be sent to the email address below, and are free of charge. However, we do not disclose personal data protected under the "Shine the Light" law to third parties for their own direct marketing purposes.

The California Consumer Privacy Act of 2018 ("CCPA") provides our users who are California residents the following additional rights:

1. Right to Know: You have the right to request that we disclose certain information to you about the personal data we collected, used, disclosed, and sold about you in the past 12 months. This includes a request to know any or all of the following:
 - The categories of personal data collected about you;
 - The categories of sources from which we collected your personal data;
 - The categories of personal data that we have sold or disclosed about you for a business purpose;
 - The categories of third parties to whom your personal data was sold or disclosed for a business purpose;
 - Our business or commercial purpose for collecting or selling your personal data; and
 - The specific pieces of personal data we have collected about you.
2. Data Portability: You have the right to request a copy of personal data we have collected and maintained about you in the past 12 months.
3. Right to Deletion: You have the right to request that we delete the personal data we collected from you and maintained, subject to certain exceptions. Please note that if you request deletion of your personal data, we may deny your request or may retain certain elements of your personal data if it is necessary for us or our service providers to:

- Complete the transaction for which the personal data was collected, provide a good or service requested by you, or reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform a contract between our business and you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity.
- Debug to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act pursuant to Chapter 3.6 (commencing with Section 1546) of Title 12 of Part 2 of the Penal Code.
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the deletion of the information is likely to render impossible or seriously impair the achievement of such research, if you have provided informed consent.
- To enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us.
- Comply with a legal obligation.
- Otherwise use the personal data, internally, in a lawful manner that is compatible with the context in which you provided the information.

4. Right to Opt-In to Financial Incentives: You have the right to opt-in and out of financial incentive programs. However, we currently do not offer any financial incentive programs.
5. Right to Opt-Out/In: You have the right to opt-out of the sale of your personal data. You also have the right to opt-in to the sale of personal data. However, we do not sell your personal data.
6. Right to Non-Discrimination: You have the right not to receive discriminatory treatment by us for the exercise of your CCPA privacy rights. Unless permitted by the CCPA, we will not:
 - Deny you goods or services.
 - Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
 - Provide you a different level or quality of goods or services.
 - Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

To exercise your California privacy rights described above, please submit a verifiable request to us by emailing us using the information provided at the end of this Privacy Notice.

Only you, or a person authorized by you to act on your behalf, may make a verifiable consumer request related to your Personal Information. You may only make a verifiable consumer request for Right to Know or Data Portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Information or an authorized representative. We will need to verify your identity with at least two (2) pieces of information, such as name, address, email address.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We may deny your request if we are unable to verify your identity or have reason to believe that the request is fraudulent.

Consumer Request by an Authorized Agent

If any authorized agent submits a consumer request on your behalf, in order to confirm that person or entity's authority to act on your behalf and verify the authorized agent's identity, we require an email be sent using the information provided at the end of this Privacy Notice, along with all of the below items:

- To verify your authorization to request on behalf of a California resident, provide one or more of the following: (1) California Secretary of State authorization, (2) signed and written permission from the California resident, or (3) an authorized power of attorney
- Sufficient information to verify the authorized agent's identity, depending on the nature of the request.

We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authority to make the request and confirm the Personal Information relates to you. We will only use Personal Information provided in a verifiable consumer request to verify the request's identity or authority to make the request.

We will acknowledge receipt of the request within ten (10) days of its receipt. We will respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. Any disclosures we provide will only cover the 12-month period preceding the receipt of the verifiable consumer request. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For Data Portability requests, we will provide the responsive information in a portable and, to the extent technically feasible, in a readily useable format that allows you to transmit the information to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

c. Your Nevada Privacy Rights

Nevada law permits our users who are Nevada consumers to request that their personal data not be sold (as defined under applicable Nevada law), even if their personal data is not currently being sold. Requests may be sent using the information provided at the end of this Privacy Notice.

d. Your Other U.S. State Privacy Rights

If you are located in Colorado, Connecticut, Delaware, Indiana, Iowa, Kentucky, Maryland, Minnesota, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Rhode Island, Tennessee, Texas, Utah and Virginia, you have certain rights regarding your personal information. The section describes how we collect, use, and share your personal information under the Colorado Privacy Act ("CPA"), the Connecticut Act Concerning Personal Data Privacy and Online Monitoring ("PDPOM"), the Delaware Personal Data Privacy Act (the "DPDPA"), the Indiana Consumer Data Protection Act (the "ICDPA"), the Iowa Consumer Data Protection Act (the "Iowa CDPA"), the Kentucky Consumer Data Protection Act (the "KCDPA"), the Maryland Online Data Privacy Act (the "MODPA"), the Minnesota Consumer Data Privacy Act (the "MCDPA"), the Montana Consumer Data Privacy Act

("MNCDPA"), the Nebraska Consumer Data Privacy Act (the "NCDPA"), New Hampshire SB 255 (the "NH Act"), New Jersey SB 332 (the "NJ Act"), the Oregon Consumer Privacy Act ("OCPA"), the Rhode Island Data Transparency and Privacy Protection Act (the "RDTPPA"), the Tennessee Information Protection Act (the "TIPA"), the Texas Data Privacy and Security Act ("TDPA"), the Utah Consumer Privacy Act ("UCPA"), and the Virginia Consumer Data Protection Act ("VCDPA"), and your rights with respect to that personal information.

As a resident of one of the foregoing states, you have some or all of the rights listed below, you have some or all of the rights listed below. However, these rights are not absolute, and we may decline your request as permitted by law. You can ask to appeal any denial of your request in the same manner through which you may submit a request.

- Right to Access and Portability. You have right to access your personal data and/or receive a copy of the personal data that we have collected about you.
- Right to Correct. You have the right to correct inaccurate or outdated Personal Information that we have collected about you.
- Right to Delete. You have the right to delete the personal data we have obtained about you or that you have provided to us with certain exceptions.
- Right to Opt-out of Tracking for Targeted Advertising Purposes. You have the right to opt-out of certain tracking activities for targeted advertising purposes.
- Right to Opt-out of Profiling. If we process your personal data for profiling purposes as defined by the applicable state privacy law (other than the ICDPA), you can opt-out of such processing.
- Right to Non-discrimination. If you exercise any of your consumer rights, you have the right to be treated the same as a consumer who does not exercise any rights.
- Right to Opt-out of Sales. You have the right to opt out of the sale of your personal data to third parties.
- Right to Opt-in for Sensitive Data Processing. To the extent we process any of your sensitive personal data (as defined under applicable U.S. state law), you have the right to opt-in before we can process any such data.
- Right Against Automated Decision-making. You have the right to opt out of certain automated decision-making about you.

e. Your European Union and United Kingdom Privacy Rights

In addition to the above-listed rights, EU and UK privacy law provides individuals with enhanced rights in respect of their personal data. These rights may include, depending on the circumstances surrounding the processing of personal data:

- The right to object to decisions based on profiling or automated decision making that produce legal or similarly significant effects on you;
- The right to request restriction of processing of personal data or object to processing of personal data carried out pursuant to (i) a legitimate interest (including, but not limited to, processing for direct marketing purposes) or (ii) performance of a task in the public interest;

- In certain circumstances, the right to data portability, which means that you can request that we provide certain personal data we hold about you in a machine-readable format; and
- In certain circumstances, the right to erasure and/or the right to be forgotten, which means that you can request deletion or removal of certain personal data we process about you.
- The right to complain with a supervisory authority. Your personal information may be blocked, anonymized, or deleted, as appropriate. If you are in the EU, you may find information about your supervisory authority [here](#) and if you are in the UK, you may lodge a complaint with the Information Commissioner's Office [here](#).

Note that we may need to request additional information from you to validate your request. To exercise any of the rights above, please contact us using the contact details provided at the end of this Privacy Notice.

4. YOUR CHOICES

You have choices about certain information we collect about you, how we communicate with you, and how we process certain personal data. When you are asked to provide information, you may decline to do so; but if you choose not to provide information that is necessary to provide some of our Services, you may not be able to use those Services. In addition, it is possible to change your browser settings to block the automatic collection of certain information.

- a. Communications Opt-Out. You may opt out of receiving marketing or other communications from us at any time through a given communications channel (such as email) by following the opt-out link or other unsubscribe instructions provided in any email message received, or by contacting us as provided at the end of this Privacy Notice. If you wish to opt out by sending us an email to the address provided below, please include "Opt-Out" in the email's subject line and include your name and the email address you used to sign up for communications in the body of the email.
- b. Location Information. We collect location information through Google Analytics (specifically, city, state and country). If you want to limit or prevent our ability to receive location information from you, you can deny or remove the permission for certain Services to access location information or deactivate location services on your device. Please refer to your device manufacturer or operating system instructions for instructions on how to do this.
- c. Cookies, Web Tracking, and Advertising. A "cookie" is a small string of text or computer code stored locally on your device (e.g. computer, smartphone or other electronic device) when you use our website. It allows us, ad networks, and our third-party service providers, to identify your browser and/or device. By using our website and with your browser set to accept cookies, you consent to our use of cookies and other technologies to provide the Services.

The following types of cookies may be used on our website:

- "Session cookies" are stored for the duration of a browser session; when you close the browser, the cookie is deleted;
- "Persistent cookies" are stored for a preset amount of time and are typically not deleted when a browser session is closed;
- "Necessary cookies" are required to provide the Services;

- “Performance cookies” collect information on how users interact with the Services; and
- “Advertising cookies” allow third party advertisers to enable advertising on your device and deliver it to you across the Internet.

Most browsers automatically accept cookies by default. You may disable non-essential cookies at any time by using your browser or device options (usually found in the “Privacy” and/or “Security” settings). Please note, if you do not want to accept cookies, you may lose some of the functionality on our website. Additionally, you can generally disable or delete cookies placed and used by browser add-ons, such as Adobe Flash cookies, by changing the add-on settings or visiting the website of its provider. Information and controls that allow you to manage Adobe Flash cookies may be found on this [page](#).

If you wish to opt out of Google Analytics and/or DoubleClick, you can download and install an opt-out browser add-on for certain browsers here: <https://www.google.com/settings/ads/>

We do not have access to or control over cookies or other features that advertisers and third-party sites may use, and the information practices of those advertisers and third-party websites are not covered by our Privacy Notice.

5. PROTECTING PERSONAL DATA

We use reasonable and appropriate physical, technical, and organizational safeguards designed to promote the security of our systems and protect the confidentiality, integrity, availability, and resilience of personal data.

However, no method of safeguarding information is completely secure. While we use measures designed to protect personal data, we cannot guarantee that our safeguards will be effective or sufficient. In addition, you should be aware that Internet data transmission is not always secure, and we cannot warrant that information you transmit utilizing the Services is or will be secure.

6. RETENTION OF PERSONAL DATA.

We retain personal data to the extent we deem necessary to carry out the processing activities described above, including but not limited to compliance with applicable laws, regulations, rules and requests of relevant law enforcement and/or other governmental agencies, and to the extent we reasonably deem necessary to protect our and our partners’ rights, property, or safety, and the rights, property, and safety of our users and other third parties. We will delete inactive contacts after a period of five (5) years.

Your personal data will not be kept in a form that allows you to be identified for any longer than we reasonably consider necessary to accomplish the purposes for which it was collected or processed, or as permitted or required by applicable laws related to data retention.

7. OTHER IMPORTANT INFORMATION ABOUT PERSONAL DATA AND THE SERVICES.

- a. Collection of Personal Data from Children. Children under 18 years of age are not permitted to use the Services, and we do not knowingly collect information from children under the age of 18. By using the Services, you represent that you are 18 years of age or older.

- b. Third-Party Websites and Services. As a convenience, we may reference or provide links to third-party websites and services, including those of unaffiliated third parties, our affiliates, service providers, and third parties with which we do business. When you access these third-party services, you leave our Services, and we are not responsible for, and do not control, the content, security, or privacy practices employed by any third-party websites and services. You access these third-party services at your own risk. This Privacy Notice does not apply to any third-party services; please refer to the Privacy Notices or policies for such third-party services for information about how they collect, use, and process personal data.
- c. Business Transfer. We may, in the future, sell or otherwise transfer some or all of our business, operations or assets to a third party, whether by merger, acquisition or otherwise. Personal data we obtain from or about you via the Services may be disclosed to any potential or actual third-party acquirers and may be among those assets transferred.
- d. Do Not Track. We use analytics systems and providers, such as Google Analytics, and participate in ad networks that process personal data about your online activities over time and across third-party websites or online services, and these systems and providers may provide some of this information to us. We do not currently process or comply with any web browser's "do not track" signal or similar mechanisms.

Note, however, that you may find information about how to opt out, block or reject certain tracking and behavioral tracking technologies in our Cookie Section of this Privacy Notice.

- e. International Use. Your personal data will be stored and processed in the United States. If you are using the Services from outside the United States, by your use of the Services you acknowledge that we will transfer your data to, and store your personal data in, the United States, which may have different data protection rules than in your country, and personal data may become accessible as permitted by law in the United States, including to law enforcement and/or national security authorities in the United States.

8. MODIFICATIONS AND UPDATES TO THIS PRIVACY NOTICE

This Privacy Notice replaces all previous disclosures we may have provided to you about our information practices with respect to the Services. We reserve the right, at any time, to modify, alter, and/or update this Privacy Notice, and any such modifications, alterations, or updates will be effective upon our posting of the revised Privacy Notice.

Your continued use of the Services following our posting of any revised Privacy Notice will constitute your acknowledgement of the amended Privacy Notice.

9. APPLICABILITY OF THIS PRIVACY NOTICE

This Privacy Notice is subject to any agreements, including the Terms of Service that govern your use of the Services. This Privacy Notice applies regardless of the means used to access or provide information through the Services.

This Privacy Notice does not apply to information from or about you collected by any third-party services, applications, or advertisements associated with, or websites linked from, the Services. The collection or receipt of your information by such third parties is subject to their own privacy policies,

statements, and practices, and under no circumstances are we responsible or liable for any third party's compliance therewith.

10. ADDITIONAL INFORMATION AND ASSISTANCE

If you have any questions or concerns about this Privacy Notice and/or how we process personal data, please contact us at:

Two Prime Inc.
Attn: Chief Compliance Officer / Data Privacy
Contact email: info@twoprime.com