

CONVICTION PRIVACY NOTICE

Last Updated: August 24, 2026

This Privacy Notice applies to the Platform (www.convictiontrade.ai), including our website and mobile application, and any other online service referencing or linking to this Privacy Notice that provides features or functionality for U.S. account holders and applicants (collectively, “**you**” or “**your**”) of Parachute Inc., a Delaware corporation doing business as “Conviction” and registered with the U.S. Securities and Exchange Commission as an investment adviser under the Investment Advisers Act of 1940, in reliance on Rule 203A-2(e) (“**Conviction**,” “**we**,” “**us**,” or “**our**”). Conviction develops and maintains its own proprietary technology platform and artificial intelligence tools, including large language models, that it uses to provide investment advisory services through the Platform.

The personally identifiable financial information Conviction collects about you is generally subject to a law called the Gramm-Leach-Bliley Act (the “GLBA”) and to Regulation S-P (17 C.F.R. Part 248) adopted by the SEC. This Privacy Notice serves as our GLBA and Regulation S-P financial privacy notice and supplements it to provide more information about how we collect, use, disclose and otherwise process personal data.

This Privacy Notice does not address our privacy practices relating to Conviction job applicants, employees and other employment-related individuals, nor data that is not subject to applicable data protection laws (such as deidentified or publicly available information in certain jurisdictions). This Privacy Notice is also not a contract and does not create any legal rights or obligations not otherwise provided by law.

Our Collection and Use of Personal Data

The categories of personal data we collect depend on how you interact with us and our services. For example, you may provide us your personal data directly when you register for an account, subscribe to our services, connect an account with a Supported Broker, create or configure a Strategy, participate in an event, promotion, or survey, or otherwise contact us or interact with the Platform.

We also collect personal data automatically when you interact with our websites and other services and may also collect personal data from other sources and third parties.

Personal Data Provided by Individuals

We collect the following categories of personal data individuals provide us:

- **Identity Information**, including first and last name, date of birth, marital status, Tax ID number, Social Security Number, government-issued identification numbers and documents. We use this information to register you for an account, verify your identity, detect and prevent fraud and comply with “know your customer” obligations under applicable law. Please note that we use third-party providers to process facial images contained in documents you submit to verify your identity. We do not retain information derived from such processing that you provide these third-party providers in connection with identity verification. Rather, all such information is provided directly by you to our third-party identity verification providers.
- **Contact Information**, including phone number, email address, mailing address, and communication preferences. We use this information primarily to fulfill your request or transaction, to communicate with you directly, and to send you marketing communications in accordance with your preferences.
- **Financial Information**, including your bank account or payment card details used to bill and collect your subscription fees through our third-party payment processor, and information about your investment account balances and financial transaction history. Because Conviction does not hold custody of client funds or securities, information about your account balances and transaction history is received from your Supported Broker. Conviction exercises limited discretionary authority over your Account and may direct your Supported Broker to execute transactions consistent with your approved Strategy and Strategy Rules. We use this information to bill

and collect your subscription fees, assess your eligibility for our services, verify your identity, detect and prevent fraud, comply with legal and regulatory obligations, and otherwise manage our relationship with you.

- **Transactional Information**, including transaction amount, type and nature of the transaction, and time and date of the transaction, received from your Supported Broker in connection with activity in your Account. We use this information to provide and administer our advisory services, maintain records of your Account activity, detect and prevent fraud, comply with legal and regulatory obligations, and otherwise manage our relationship with you.
- **Advisory Profile Information**, including information you provide through the Platform's onboarding questionnaire and strategy-creation tools, such as your risk tolerance, investment objectives, time horizon, financial situation, liquidity needs, and tax status, as well as your Account size, investment universe, strategy instructions, and allocation inputs. You may describe a Strategy in natural language, and Conviction may interpret those instructions and translate them into executable Strategy Rules. We use this information to assess the suitability of the Strategies, Strategy Rules, and other advisory outputs we make available to you through the Platform, to determine suggested position sizing and allocation, to provide ongoing automated monitoring of your Account, Strategies, Strategy Rules, and proposed positions, and to communicate with you about your investment goals and needs. We do not provide holistic financial planning services.
- **Professional Information**, including job title, company name, professional background, and the nature of your relationship with us. We use this information primarily to fulfill your request or transaction, to determine how we communicate with you, to administer your account, to provide you with our services, and for user support purposes.
- **User Content**, including any files, documents, data, natural-language strategy descriptions, or communications you choose to input, upload, or transmit to the Platform. We use this content primarily to provide you with our products and services, to facilitate your requests, and to test and monitor the performance of the software, quantitative models, and artificial intelligence tools, including large language models ("LLMs"), used to interpret natural-language strategy descriptions, translate them into Strategy Rules, conduct research and backtesting, and support execution of trades consistent with approved Strategies and Strategy Rules. We describe our use of artificial intelligence and algorithmic tools accurately and do not claim capabilities we do not have.
- **Event, Contest, Promotion, and Survey Information**, including information provided when you sign up for an event, enter a contest or promotion, complete a survey or submit a testimonial. We use this information primarily to administer and facilitate our products and services, respond to your submission, communicate with you, conduct market research, inform our marketing and advertising activities, improve and grow our business, and facilitate the related event, contest, promotion, or survey.
- **Security-Related Information**, including name and contact information of visitors to our premises, video recordings of videos on our premises, and electronic login records and access details when a visitor utilizes company technology on our premises. We use this information primarily to protect the security of our premises, employees, and our company.
- **Feedback and Support Information**, including the contents of custom messages sent through the forms, chat platforms, including our online live chat or automated chat functions, email addresses, or other contact information we make available to users, as well as recordings of calls with us, where permitted by law (including through the use of automated tools or artificial intelligence tools, including large language models ("LLMs"), provided by us or our third-party providers). We use this information primarily to investigate and respond to your inquiries, to communicate with you via online chat, email, phone, text message or social media, and to improve our products and services.

Personal Data Automatically Collected

We, and our third-party partners, automatically collect information you provide to us and information about how you access and use our products and services when you engage with us. We typically collect this information through the use of a variety of our own and our third-party partners' automatic data collection technologies, including (i) cookies or small data files that are stored on an individual's computer and (ii) other, related technologies, such as web beacons, pixels, embedded scripts, mobile SDKs, location-identifying technologies and logging technologies. Information we collect

automatically about you may be combined with other personal data we collect directly from you or receive from other sources.

We, and our third-party partners, use automatic data collection technologies to automatically collect the following data when you use our services or otherwise engage with us:

- **Information About Your Device and Network**, including the device type, manufacturer, and model, operating system, IP address, browser type, Internet service provider, and unique identifiers associated with you, your device, or your network (including, for example, a persistent device identifier or advertising ID). We employ third-party technologies designed to allow us to recognize when two or more devices are likely being used by the same individual and may leverage these technologies (where permitted by law) to link information collected from different devices.
- **Information About the Way Individuals Use Our Services and Interact With Us**, including the site from which you came, the site to which you are going when you leave our services, how frequently you access our services, whether you open emails or click the links contained in emails, whether you access our services from multiple devices, and other browsing behavior and actions you take on our services (such as the pages you visit, the content you view, videos you watch, the communications you have through our services, and the content, links and ads you interact with). We employ third-party technologies designed to allow us to collect detailed information about browsing behavior and actions that you take on our services, which may record your mouse movements, scrolling, clicks, and keystroke activity on our services and other browsing, search or purchasing behavior. These third-party technologies may also record information you enter when you interact with our products or services, or engage in chat features or other communication platforms we provide.
- **Information About Your Location**, including general geographic location that we or our third-party providers may derive from your IP address.

All of the information collected automatically through these tools allows us to improve your experience. For example, we may use this information to enhance and personalize your user experience, to monitor and improve our products and services, to offer communications features, and to improve the effectiveness of our products, services, offers, advertising, communications and user service. We may also use this information to: (a) remember information so that you will not have to re-enter it during your visit or the next time you visit the site; (b) provide custom, personalized content and information, including targeted content and advertising; (c) identify you across multiple devices; (d) provide and monitor the effectiveness of our services; (e) monitor aggregate metrics such as total number of visitors, traffic, usage, and demographic patterns on our website; (f) diagnose or fix technology problems; and (g) otherwise to plan for and enhance our products and services.

For information about the choices you may have in relation to our use of automatic data collection technologies, please refer to the [Your Privacy Choices](#) section below.

Personal Data from Other Sources and Third Parties

We may receive the same categories of personal data as described above from the following sources and other parties:

- **Service Providers**: Our service providers that perform services on our behalf, such as our third-party payment processor, identity verification and fraud-prevention vendors, cloud hosting providers, and cybersecurity vendors, collect personal data and often share some or all of this information with us. For example, our identity verification vendor may provide us with the results of identity checks performed during onboarding.
- **Your Supported Broker**: Because Conviction does not hold custody of client funds or securities, you must establish and maintain your Account with a Supported Broker (as defined in our Investment Advisory Agreement and Terms of Service). We may receive account information, such as account balances and transaction history, you're your Supported Broker to enable the Platform to present your Strategies, Strategy Rules, other advisory outputs, and orders, and to enable Conviction to direct transactions consistent with your approved Strategy and Strategy Rules.
- **Vendors and Business Partners**: We collect information about you from companies that we do business with, such as name, contact data, inferences about your preferences and attributes, and inferred fraud risk from identity verification and fraud prevention partners.

- **Financial Account Linking:** Conviction connects to accounts maintained with Supported Brokers through application programming interfaces (“APIs”) rather than through a separate data-aggregation vendor. Conviction may receive financial account information, such as account balances and transaction history, directly from your Supported Broker. This information enables the Platform to present your Strategies, Strategy Rules, other advisory outputs, and orders, and to facilitate transactions consistent with your approved Strategy and Strategy Rules.
- **Single Sign-On:** We may provide you the ability to log in to our services through certain third-party accounts you maintain. When you use these single sign-on protocols to access our services, we do not receive your login credentials for the relevant third-party service. Instead, we receive tokens from the single sign-on protocol to help identify you in our system (such as by your username) and confirm you successfully authenticated through the single sign-on protocol. This information allows us to more easily provide you access to our products and services.
- **Mobile Sign-On:** We may provide you the ability to log in to our mobile applications or authenticate yourself using facial, fingerprint, or other biometric recognition technology available through your mobile device. If you choose to utilize these login features, information about your facial geometry, your fingerprint, or other biometric information will be collected by your mobile device for authentication purposes. We do not store or have access to this biometric information. Instead, your mobile device will perform the biometric authentication process and only let us know whether the authentication was successful. If the authentication was successful, you will be able to access the applicable mobile application or feature without separately providing your credentials. For more details, please refer to the biometric authentication guides offered by your device provider.
- **Employers:** If you interact with our services in connection with your employment, we may obtain personal data about you from your employer or another company for which you work. For example, we may obtain your contact information from your employer to allow us to communicate with you about your employer’s relationship with us.
- **Other Users:** We may receive your personal data from our other users. For example, a user may provide us with your contact information as a part of a referral.
- **Social Media:** When you interact with our services through other social media networks, such as when you follow us or share our content on other social networks, we may receive some information that you permit the social network to share with third parties. The data we receive is dependent upon your privacy settings with the social network, and may include profile information, profile picture, username, and any other information you permit the social network to share with third parties. You should always review and, if necessary, adjust your privacy settings on third-party websites and social media networks and services before sharing information and/or linking or connecting them to other services. We use this information primarily to operate, maintain, and provide to you the features and functionality of our products and services, as well as to communicate directly with you, such as to send you messages about features that may be of interest to you.
- **Advertisers, Influencers, and Publishers:** We engage in advertising both on our services and through third-party services. Advertisers, influencers, and publishers may share personal data with us in connection with our advertising efforts. For example, we may obtain information about whether an advertisement on our services led to a successful engagement between you and a third-party advertiser.
- **Business Partners:** We may receive your information from our business partners, such as companies that offer their products and/or services as a part of or in connection with our services. For example, certain of our products and services allow our users to integrate third-party services. If you choose to leverage these third-party service integrations, we may receive confirmation from our business partner regarding whether you are an existing user of their services.
- **Other Sources:** We may also collect personal data about you from other sources, including publicly available sources, third-party data providers, or through transactions such as mergers and acquisitions.

- **Inferences:** We may generate inferences or predictions about you and your interests and preferences based on the other personal data we collect and the interactions we have with you.

Additional Uses of Personal Data

In addition to the primary purposes for using personal data described above, we may also use personal data we collect to:

- Fulfill or meet the reason the information was provided, such as to fulfill our contractual obligations, to facilitate payment for our products and services, or to deliver the services requested;
- Support the interpretation of natural-language strategy descriptions, translation of those descriptions into Strategy Rules, the generation and evaluation of Strategies and other advisory outputs, backtesting, monitoring, and execution of trades consistent with approved Strategies and Strategy Rules using our software, quantitative models, and artificial intelligence tools, including large language models ("LLMs"); evaluate your Advisory Profile Information to assess suitability and to help detect potential fraud or identity issues; and, under the limited discretionary authority described in our Investment Advisory Agreement, direct your Supported Broker to execute transactions consistent with your approved Strategy and Strategy Rules, subject to applicable restrictions, risk controls, and oversight by our Chief Compliance Officer;
- Manage our organization and its day-to-day operations;
- Communicate with you, including via email, text message, chat, social media and/or telephone calls;
- Facilitate the relationship we have with you and, where applicable, the company you represent;
- Request you provide us feedback about our product and service offerings;
- Address inquiries or complaints made by or about an individual in connection with our products or services;
- Create and maintain accounts for our users;
- Verify your identity and entitlement to our products and services;
- Register you for and provide you access to events, contests, sweepstakes, and surveys;
- Market our products and services to you, including through email, text message, push notification, and social media;
- Administer, improve, and personalize our products and services, including by recognizing you and remembering your information when you return to our products and services;
- Develop, operate, improve, maintain, protect, and provide the features and functionality of the Platform (including by testing and monitoring the performance of the software, quantitative models, and artificial intelligence tools, including large language models ("LLMs"), used to interpret natural-language strategy descriptions, translate them into Strategy Rules, and support research, backtesting, monitoring, and execution of trades consistent with approved Strategies and Strategy Rules, both before deployment and on an ongoing basis);
- Identify and analyze how you use our products and services;
- Infer additional information about you from your use of our products and services, such as your interests;
- Create aggregated or de-identified information that cannot reasonably be used to identify you, which information we may use for purposes outside the scope of this Privacy Notice;

- Conduct research and analytics on our user base and our products and services, including to better understand the demographics of our users;
- Improve and customize our products and services to address the needs and interests of our user base and other individuals we interact with;
- Test, enhance, update, and monitor the products and services, or diagnose or fix technology problems;
- Help maintain and enhance the safety, security, and integrity of our property, products, services, technology, assets, and business;
- Defend, protect, or enforce our rights or applicable contracts and agreements (including the Conviction Terms of Service available at www.convictiontrade.ai), as well as to resolve disputes, to carry out our obligations and enforce our rights, and to protect our business interests and the interests and rights of third parties;
- Detect, prevent, investigate, or provide notice of security incidents or other malicious, deceptive, fraudulent, or illegal activity and protect the rights and property of Conviction and others;
- Facilitate business transactions and reorganizations impacting the structure of our business;
- Comply with contractual and legal obligations and requirements, including recordkeeping and reporting obligations under the Investment Advisers Act of 1940 and Regulation S-P, and sanctions screening administered by the U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC");
- Screen you against sanctions lists maintained by OFAC at onboarding and on an ongoing basis; please note that a separate FinCEN rule that would require investment advisers to maintain a broader anti-money laundering/countering the financing of terrorism program has an effective date that has been delayed to January 1, 2028, and is not yet a current legal obligation applicable to us;
- Fulfill any other purpose for which you provide your personal data, or for which you have otherwise consented.

As noted above, we test and monitor the performance of the software, quantitative models, and artificial intelligence tools, including large language models ("LLMs"), that support the Platform and our advisory services, including the interpretation of natural-language strategy descriptions, translation into Strategy Rules, research, backtesting, monitoring, and execution of trades consistent with approved Strategies and Strategy Rules, both before deployment and on an ongoing basis, and we may use your personal data (including your Advisory Profile Information) in that process, consistent with the accurate description of our technology in Conviction's Form ADV Part 2A.

Our Disclosure of Personal Data

We disclose or otherwise make available personal data in the following ways:

- **Your Supported Broker:** We disclose information about you to your Supported Broker (as defined in our Investment Advisory Agreement) as necessary to connect to your Account, receive account information, and direct transactions consistent with your approved Strategy and Strategy Rules. Conviction does not hold custody of your funds or securities; your assets are held by your Supported Broker. Conviction exercises limited discretionary authority only to direct transactions consistent with the Investment Advisory Agreement and does not authorize Conviction to withdraw or transfer your funds or securities.
- **Authorized Service Providers:** We disclose information about you to vendors who perform services for us, such as our third-party payment processor, identity verification and fraud-prevention vendors, cloud hosting providers, cybersecurity vendors, and providers who support our compliance, marketing, and analytics functions.
- **Companies in Which You Hold Securities:** We may provide information, including your name, address, email address, and securities positions, to companies in which you hold securities, upon their request. This disclosure

does not mean that Conviction holds custody of your securities; as described above, your assets are held by your Supported Broker.

- **To Your Employer:** If you interact with our services in connection with your employment, we may disclose personal data to your employer or another company for which you work. For example, we may provide information to your employer about your usage of our services in connection with your work for them.
- **To Marketing Providers:** We coordinate and share personal data with our marketing providers in order to advertise and communicate with you about the products and services we make available.
- **To Ad Networks and Advertising Partners:** We work with third-party ad networks and advertising partners to deliver advertising and personalized content on our services, on other websites and services, and across other devices. These parties may collect information automatically from your browser or device when you visit our websites and other services through the use of cookies and related technologies. This information is used to provide and inform targeted advertising, as well as to provide advertising-related services such as reporting, attribution, analytics, and market research.
- **To Business Partners:** We may share personal data with our business partners, or we may allow our business partners to collect personal data directly from you in connection with our services. Our business partners may use your personal data for their own business and commercial purposes, including to send you information about their products and services.
- **In Connection with a Business Transaction or Reorganization:** We may take part in or be involved with a business transaction or reorganization, such as a merger, acquisition, joint venture, or financing or sale of company assets. We may disclose, transfer, or assign personal data to a third party during negotiation of, in connection with, or as an asset in such a business transaction or reorganization. Also, in the unlikely event of our bankruptcy, receivership, or insolvency, your personal data may be disclosed, transferred, or assigned to third parties in connection with the proceedings or disposition of our assets.
- **To Facilitate Legal Obligations and Rights:** We may disclose personal data to third parties, such as legal advisors and law enforcement:
 - o in connection with the establishment, exercise, or defense of legal claims;
 - o to comply with laws or to respond to lawful requests and legal process;
 - o to protect our rights and property and the rights and property of our agents, customers, and others, including to enforce our agreements, policies, and terms of use;
 - o to detect, suppress, or prevent fraud;
 - o to reduce credit risk and collect debts owed to us;
 - o to protect the health and safety of us, our customers, or any person; or
 - o as otherwise required by applicable law.
- **With Your Consent or Direction:** We may disclose your personal data to certain other third parties or publicly with your consent or direction. For example, with your permission, we may post your testimonial on our websites.

Your Privacy Choices

Communication Preferences

- **Email Communication Preferences:** You can stop receiving promotional email communications from us by clicking on the “unsubscribe” link provided in any of our email communications. Please note you cannot opt-out of service-related email communications (such as, account verification, transaction confirmation, or service update emails).
- **Mobile Communication Preferences:** You can stop receiving promotional phone communications from us by informing the caller you no longer wish to receive promotional phone calls from us, following the instructions provided on the call for opting out of promotional phone calls (where available), or replying STOP to any one of our promotional text messages. Please note we may need to continue to communicate with you via phone for certain service-related messages (such as, sending a verification code to your phone via call or text for purposes of verifying the authenticity of a log-in attempt).
- **Push Notification Preferences:** You can stop receiving push notifications from us by changing your preferences in your device’s notification settings menu or in the applicable service-specific application. Please note we do not have any control over your device’s notifications settings and are not responsible if they do not function as intended.

Withdrawing Your Consent

Where we have your consent for the processing of your personal data (e.g., when you opt in to receive certain types of marketing communications from us), you may withdraw your consent by following the instructions provided when your consent was requested or by contacting us as set forth in the [Contact Us](#) section below.

Automatic Data Collection Preferences

You may be able to utilize third-party tools and features to restrict our use of automatic data collection technologies. For example, (i) most browsers allow you to change browser settings to limit automatic data collection technologies on websites, (ii) most email providers allow you to prevent the automatic downloading of images in emails that may contain automatic data collection technologies, and (iii) many devices allow you to change your device settings to limit automatic data collection technologies for device applications. Please note that blocking automatic data collection technologies through third-party tools and features may negatively impact your experience using our services, as some features and offerings may not work properly or at all. Depending on the third-party tool or feature you use, you may not be able to block all automatic data collection technologies or you may need to update your preferences on multiple devices or browsers. We do not have any control over these third-party tools and features and are not responsible if they do not function as intended.

Targeted Advertising Preferences

We may engage third parties to help us facilitate targeted advertising designed to show you personalized ads based on predictions of your preferences and interests developed using personal data we maintain and personal data our third-party partners obtain from your activity over time and across nonaffiliated websites and other services. The data we and our third-party partners use for purposes of facilitating targeted advertising, as well as to provide advertising-related services such as reporting, attribution, analytics, and market research, are primarily collected through the use of a variety of automatic data collection technologies, including cookies, web beacons, pixels, embedded scripts, mobile SDKs, location-identifying technologies and logging technologies. We may share a common account identifier (such as a hashed email address or user ID) with our third-party advertising partners to help link the personal data we and our third-party partners collect to the same person, or otherwise target advertising to an individual on a third-party website or platform.

In addition to taking the steps set forth in the [Automatic Data Collection Preferences](#) section above, you may be able to further exercise control over the advertisements that you see by leveraging one or more targeted advertising opt-out programs. For example:

- **Device-Specific Opt-Out Programs:** Certain devices provide individuals the option to turn off targeted advertising for the entire device (such as Apple devices through their App Tracking Transparency framework or Android devices through their opt out of ads personalization feature). Please refer to your device manufacturer’s

user guides for additional information about implementing any available device-specific targeted advertising opt-outs.

- **Digital Advertising Alliance:** The [Digital Advertising Alliance](#) allows individuals to opt out of receiving online interest-based targeted advertisements from companies that participate in their program. Please follow the instructions at <https://optout.aboutads.info/?c=2&lang=EN> for browser-based advertising and <https://www.youradchoices.com/appchoices> for app-based advertising to opt out of targeted advertising carried out by our third-party partners and other third parties that participate in the Digital Advertising Alliance's self-regulatory program.
- **Network Advertising Initiative:** The [Network Advertising Initiative](#) also provides individuals instructions for further controlling how information is used for online advertising. Please follow the instructions at <https://thenai.org/how-to-opt-out/> to exercise these controls.
- **Platform-Specific Opt-Out Programs:** Certain third-party platforms provide individuals the option to turn off targeted advertising for the entire platform (such as certain social media platforms). Please refer to your platform provider's user guides for additional information about implementing any available platform-specific targeted advertising opt-outs.

Please note that when you opt out of receiving interest-based advertisements through one of these programs, this does not mean you will no longer see advertisements from us or on our services. Instead, it means that the online ads you do see from relevant program participants should not be based on your interests. We are not responsible for the effectiveness of, or compliance with, any third parties' opt-out options or programs or the accuracy of their statements regarding their programs. In addition, program participants may still use automatic data collection technologies to collect information about your use of our services, including for analytics and fraud prevention as well as any other purpose permitted under the applicable advertising industry program.

Modifying or Deleting Your Personal Data

If you have any questions about reviewing, modifying, or deleting your personal data, you can contact us as set forth in the [Contact Us](#) section below. We may not be able to modify or delete your personal data in all circumstances.

Partner-Specific Preferences

Certain of our third-party providers and partners offer additional ways that you may exercise control over your personal data, or automatically impose limitations on the way we can use personal data in connection with the services they provide:

- **Device-Specific / Platform-Specific Preferences:** The device and/or platform you use to interact with us (such as your mobile device or social media provider), may provide you additional choices with regard to the data you choose to share with us. For example, many mobile devices allow you to change your device permissions to prevent our products and services from accessing certain types of information from your device (such as your contact lists), and many social media platforms allow you to change your platform permissions to prevent integrated products and services from accessing certain types of information connected with your profile. Please refer to your device or platform provider's user guides for additional information about implementing any available platform-specific targeted advertising opt-outs.
- **Google Analytics:** Google Analytics allows us to better understand how our customers interact with our services. For information on how Google Analytics collects and processes data, as well as how you can control information sent to Google, review Google's website here: www.google.com/policies/privacy/partners/. You can learn about Google Analytics' currently available opt-outs, including the Google Analytics Browser Add-On here: <https://tools.google.com/dlpage/gaoptout/>. We may also utilize certain forms of display advertising and other advanced features through Google Analytics. These features enable us to use first-party cookies (such as the Google Analytics cookie) and third-party cookies (such as the DoubleClick advertising cookie) or other third-party cookies together to inform, optimize, and display ads based on your past visits to our services. You may control your advertising preferences or opt-out of certain Google advertising products by visiting the Google Ads Preferences Manager, currently available at <https://myadcenter.google.com/?ref=help-center>.

Individual Rights

Depending on your state of residence, you may have the right to access, correct, or request deletion of the personal data we maintain about you, and, to the extent applicable, to opt out of the sale of personal data or the use of your personal data for targeted advertising. You may exercise these rights by contacting us as set forth in the [Contact Us](#) section below, and we will respond to verified requests consistent with applicable law.

Children's Personal Data

Individuals under the age of 18, or below the age of majority in which individuals can enter into legally binding contracts in the jurisdiction where they are using the platform or platform services, as applicable, are not permitted to subscribe to any of our services.

Our services are not directed to, and we do not intend to, or knowingly, collect or solicit personal data from children under the age of 13. If an individual is under the age of 13, they should not use our services or otherwise provide us with any personal data either directly or by other means. If a child under the age of 13 has provided personal data to us, we encourage the child's parent or guardian to contact us to request that we remove the personal data from our systems. If we learn that any personal data we collect has been provided by a child under the age of 13, we will promptly delete that personal data.

Security of Personal Data

We maintain a written information security program designed to protect your personal data, addressing access controls, encryption, multi-factor authentication, vulnerability management, monitoring and logging, incident response, and periodic testing and employee training, including periodic penetration testing and vulnerability assessments of the Platform and its supporting infrastructure. In addition, we take steps designed to ensure any third party with whom we share personal data provides a similar level of protection. However, despite these controls, we cannot completely ensure or warrant the security of your personal data.

Data Retention

We generally retain the books and records containing your personal data for five years from the end of the fiscal year in which the record was last used, consistent with Rule 204-2 under the Investment Advisers Act of 1940 (with records from the first two years kept in an easily accessible place), in a form that preserves and reproduces the records. Specific retention periods vary by category of record, as set out in our internal compliance policies and procedures.

Regulation S-P and Other Regulatory Disclosures

Conviction is registered with the SEC as an investment adviser under the Investment Advisers Act of 1940 in reliance on Rule 203A-2(e) and is subject to Regulation S-P (17 C.F.R. Part 248), which governs how we handle nonpublic personal information about our clients. Because our clients are exclusively U.S.-based natural persons, substantially all of our client base is treated as "customers" whose nonpublic personal information is protected under Regulation S-P.

Regulation S-P requires us to deliver an initial privacy notice to each client at the start of the advisory relationship. Subject to the exception created by the Fixing America's Surface Transportation (FAST) Act — available to advisers that have not changed their privacy policies and practices since their last notice and that do not share nonpublic personal information with unaffiliated third parties in a manner that triggers opt-out rights — we may not be required to redeliver this notice annually.

The SEC's 2024 amendments to Regulation S-P require registered investment advisers to adopt a written incident-response program, provide notice to affected individuals of certain incidents involving unauthorized access to sensitive customer information (generally no later than 30 days after we become aware of the incident), and oversee our service providers' notification of security incidents involving customer information (generally requiring the service provider to notify us within 72 hours of discovering an incident). As a smaller adviser, our compliance date for these amendments is June 3, 2026.

We also screen prospective and existing clients against sanctions lists maintained by OFAC at onboarding and on an ongoing basis. Separately, FinCEN has adopted a rule that will require investment advisers to maintain anti-money laundering and countering the financing of terrorism programs; that rule's effective date has been delayed to January 1, 2028, and it is not yet a current legal obligation applicable to us.

Third-Party Websites and Services

Our websites and other services may include links to or redirect you to third-party websites, plug-ins, applications, or other services, including social media services where you may connect with us. Third-party websites and other services may

also reference or link to our websites and services. This Privacy Notice does not apply to any personal data practices of these third-party websites, plug-ins, applications, or other services. To learn about these third parties' personal data practices, please visit their respective privacy notices.

International Transfers of Personal Data

If you are located outside the United States, the personal data we collect about you may be transferred to and processed in the United States. The United States may not provide the same level of data protection as your home country. We use appropriate measures, where required by applicable law, to protect personal data that is transferred internationally. By using our services, interacting with us, or otherwise providing your personal data, you acknowledge that your personal data may be transferred to and processed in the United States and other jurisdictions as described in this Privacy Notice.

Updates to This Privacy Notice

We may update this Privacy Notice from time to time. When we make changes to this Privacy Notice, we will change the date at the beginning of this Privacy Notice. We will deliver updated Privacy Notices to you electronically, consistent with our Investment Advisory Agreement, by emailing the address we have on file for you and by prominently posting the updated notice on the Platform. If we make a material change to this Privacy Notice, we intend to notify you by email approximately 30 days before the change takes effect. All changes shall be effective from the date of publication unless otherwise provided.

Contact Us

If you have any questions or requests in connection with this Privacy Notice or other privacy-related matters, please contact us at 95 Third Street, Suite 2, San Francisco, CA 94103, by email at support@convictiontrade.ai.