

Hedgia LLC Privacy Policy

Effective Date: August 13, 2025

This Privacy Policy describes how Hedgia LLC ("Hedgia," "we," "us," or "our") collects, uses, and discloses information related to your use of our **Basic Services** platform and services, available through our website (the "Platform" or "Site"). This policy applies to all visitors, users, and others who access or use the **Basic Services** of the Platform prior to any "Paywall" for our **Paid Services**.

Please read this Privacy Policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Platform.

1. Our Role

Hedgia acts as a **data controller** (or "business" under certain U.S. state privacy laws) for the personal information we collect directly from you or receive from third parties for the purposes of providing our Platform services, managing your account, and ensuring compliance with our eligibility criteria.

When you use the Persona service integrated with our Platform for identity verification, Persona acts as a **data processor** (or "service provider" under certain U.S. state privacy laws), processing your personal data at our direction. While Persona handles the core identity verification process, Hedgia receives certain data from Persona to fulfill our compliance obligations related to our **Basic Services**.

2. Information We Collect and How We Collect It

We collect several types of personal information from and about users of our **Basic Services** Platform. "Personal information" means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual.

a. Information You Provide Directly to Us:

- **Identifiers:** Such as your chosen username, email address, phone number, and postal address. We store and may verify your postal address as part of our account management and compliance procedures.
- **Account Information:** Your password (stored securely as a hash) and any profile preferences you set.
- **User Input for Document Generation:** Any and all information you input into our AI-driven document generation tools, including but not limited to:
 - Entity names, addresses, and formation details.
 - Investment terms, capital contributions, and distribution preferences.

- o Details of participants, including names, addresses, and other relevant identifying information required for the legal documents.
- o Any other specific data points requested by the Platform to generate your legal document package.
- **Communications Data:** Records and copies of your correspondence with us (including email addresses and content of messages), if you contact our support or provide feedback.

b. Information We Receive from Third Parties:

- **Identity Verification Data from Persona:** When you undergo identity verification through Persona (also known as WithPersona), you submit information directly to Persona. While Hedgia does **not** store sensitive identity verification documents (e.g., scans of government IDs, biometric data like facial geometry scans) on its own servers, we receive certain confirmations and limited associated data from Persona. This includes:
 - o Confirmation of your identity verification status (e.g., verified/failed).
 - o Certain identifiers (e.g., confirmed name, date of birth) necessary for our compliance records related to your eligibility.
 - o Data related to the outcomes of compliance checks performed by Persona at our direction (e.g., sanctions screening results, criminal history flags, regulatory action flags, where applicable, without receiving the underlying sensitive source documents).
 - o For details on the types of data Persona collects directly from you (including biometric data such as facial geometry scans), how they store it, and their specific privacy practices, please refer to Persona's Privacy Policy available at <https://withpersona.com/legal/privacy-policy>.
- **Other Third-Party Data:** We may receive limited information from other service providers that assist us with analytics or security, such as information about your device, IP address, or general location.

c. Information We Collect Automatically (Usage Details, IP Addresses, Cookies):

As you navigate through and interact with our Platform, we and our third-party service providers use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns. This includes:

- **Internet Activity Information:** Details of your access to and use of the Platform, such as the pages you viewed, services and features you used, browser type, details about any links or communications you interacted with, and operating system.
- **Identifiers and Device Information:** Your Internet Protocol (IP) address, device identifiers (e.g., MAC address), device type, and your device's operating system, browser, cookie and device identifiers, and other software including type, version, language, settings, and configuration.
- **Geolocation Data:** General geographic location (such as city, state, and country) inferred from your IP address or collected from your device settings.

- **Cookies and Other Tracking Technologies:** We use cookies, web beacons, embedded scripts, and similar technologies to collect data, operate our websites and online services, and to help collect usage data, identifiers, and device information..

d. Sensitive Personal Information:

We may process certain categories of personal information that are considered “sensitive” under applicable privacy laws—such as specific criminal history or regulatory enforcement flags—when necessary to screen for eligibility to use the Basic Services.

If you choose to enroll in Hedgia’s Paid Services (such as fund administration), we may also collect and store additional sensitive information—including, but not limited to, Social Security Numbers (SSNs), Taxpayer Identification Numbers (TINs), and Employer Identification Numbers (EINs)—as provided through Forms W-9 or SS-4. The collection, storage, and use of such government identifiers occurs only in connection with our Paid Services, is subject to separate privacy disclosures and terms for Paid Services, and is strictly limited to what is needed for regulatory compliance, identity verification, account administration, and tax reporting.

e. Information Collected for Paid Services (Post-Paywall):

If you choose to enroll in Hedgia’s Paid Services, such as fund administration, we may collect additional sensitive information—such as Social Security Numbers (SSNs), Taxpayer Identification Numbers (TINs), and Employer Identification Numbers (EINs)—through documents like Forms W-9 or SS-4. This information is collected and stored solely for regulatory compliance, identity verification, account administration, and tax reporting, as set forth in the separate Privacy Policy or terms applicable to Paid Services.

3. How We Use Your Information

We use information that we collect about you or that you provide to us for the following business and commercial purposes:

- **To Provide and Manage Our Services:** To present our Platform and its contents to you, allow you to create and manage an account, provide you with the AI-driven document generation services, and enable document downloads.
- **To Determine Eligibility:** To apply the "Eligibility and Service Filters" (as described in our Terms of Service for **Basic Services**) to assess and confirm your eligibility for using specific services on the Platform.
- **For Compliance and Security:**
 - To verify your identity (via Persona integration) to comply with legal and regulatory obligations, including "Know Your Customer" (KYC) and Anti-Money Laundering (AML) requirements, and to assess risks.
 - To detect, prevent, or investigate potential security incidents, fraud, or other inappropriate activity.
 - To maintain the security and integrity of our systems and Platform.
 - To comply with applicable law and regulatory processes and reporting requirements.

- **To Improve Our Platform:** To understand how users interact with our Platform, troubleshoot problems, and make enhancements to our services, including refining our AI models. **Note: While your input data (User Content) helps improve our AI models, sensitive identifying information will be anonymized, de-identified, or aggregated for these purposes where possible and legally permissible.**
- **To Communicate with You:** To provide you with notices about your account, respond to your inquiries, and inform you about changes to our Platform or any products or services we offer.
- **For Analytics and Research:** To perform data analytics and research to understand user behavior, trends, and preferences, and to monitor and analyze usage and activity trends.
- **To Enforce Our Terms:** To enforce our Terms of Service and other policies related to the use and access of our Platform, and to protect our rights, privacy, safety, or property, and/or that of you or others.
- **For Operational Purposes:** To perform operations to maintain our Platform and Services, including data analysis, testing, and system maintenance.
- **To Fulfill Legal and Regulatory Obligations Associated with Paid Services:** If you enroll in our Paid Services (such as fund administration), we may use sensitive information provided by you—including Social Security Numbers (SSNs), Taxpayer Identification Numbers (TINs), and Employer Identification Numbers (EINs)—exclusively for identity verification, regulatory compliance, account administration, and tax reporting, as required for those Paid Services.
- **For Incidental Purposes:** Any incidental purposes related to, or in connection with, the above.

4. Disclosure of Your Information

We may share aggregated data about our users or information that cannot be used to identify any individual, without limitation.

We may also disclose personal information that we collect from you or that you provide to us, as set forth in this Privacy Policy. Where noted, certain disclosures apply only if you enroll in Paid Services and provide additional sensitive information (such as government-issued identifiers):

- **To Our Service Providers:** To contractors, service providers, and other third parties we use to support our business (e.g., web hosting, analytics providers, customer support, IT and system administration services, email communication and SMS software providers). These parties are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them.
- **For Identity Verification (Persona):** As detailed in Section 2(b), we integrate with Persona for identity verification. We transmit necessary identifiers (e.g., your name, email, phone number, and any other data points required by Persona to initiate the verification process) to Persona, and Persona provides us with confirmation of your verification status and limited associated data. Your sensitive identity verification documents and biometric data are collected and stored by Persona directly, as per their privacy policy.
- **To Comply with Legal Requirements:** We may access, disclose, or retain personal information as needed to comply with any applicable law, regulation, court order, legal

process, or government or regulatory request. This may include responding to subpoenas, law enforcement inquiries, or fulfilling other reporting and regulatory obligations.

- **To Enforce Our Rights:** To enforce or apply our Terms of Service and other agreements, including to detect, prevent, or otherwise address fraud, security, or technical issues; and/or to prevent or stop activity we reasonably consider to be, or to pose a risk of being, an illegal, unethical, or legally actionable activity.
- **In Case of Business Transfer:** To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Hedgia LLC's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by Hedgia LLC about our Platform users is among the assets transferred.
- **With Your Consent:** For any other purpose disclosed by us when you provide the information, or with your explicit consent.

No Sale or Sharing of Personal Information for Cross-Context Behavioral Advertising:

Hedgia does not "sell" or "share" personal information for monetary or other valuable consideration, nor for cross-context behavioral advertising, as those terms are defined under the California Consumer Privacy Act (CCPA) and California Privacy Rights Act (CPRA).

5. Data Security

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. All information you provide to us through your account creation and document input is stored on secure servers behind firewalls. We use standard, industry-wide, commercially reasonable security practices to protect your information. If you enroll in our Paid Services and provide sensitive government identifiers (such as SSNs, TINs, or EINs), we use additional safeguards and data handling protocols to further protect this information from unauthorized access, use, or disclosure.

However, the safety and security of your information also depend on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Platform, you are responsible for keeping this password confidential. We ask you not to share your password with anyone or reuse it across multiple services.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Platform. Any transmission of personal information is done at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Platform.

6. Data Retention

We retain personal information for as long as necessary to fulfill the purposes for which it was collected, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the

amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, or contractual requirements.

Notwithstanding the foregoing, in most cases, we will retain your personal information, including after account deletion or the termination of our relationship, for a minimum period of seven (7) years to comply with our legal, regulatory, and reporting obligations, as well as for fraud prevention, dispute resolution, and other legitimate business purposes. For government-issued identifiers (SSNs, TINs, EINs) provided for Paid Services, we retain this data only for as long as necessary to comply with tax, regulatory, and legal obligations related to those services, or as otherwise permitted by law. Such information is not collected or retained in connection with Basic Services.

For the limited data we receive from Persona regarding identity verification status and confirmed identifiers, we retain this data consistent with our compliance and operational needs, and as required by law. For specific retention policies of the sensitive identity verification data (including biometric data and government IDs) collected and stored by Persona directly, please refer to Persona's Privacy Policy.

7. Children's Privacy

The Platform is not intended for use by anyone under 18 years of age. As set out in our Terms of Service, only individuals who are at least 21 years old are eligible for our Basic Services. We do not knowingly collect personal information from children under 18. If you are under 18, do not use the Platform, register for an account, make purchases, use any interactive features, or provide any personal details such as your name, address, phone number, email, or username.

If we become aware that we have collected personal information from a child under 18 without parental or guardian consent, we will promptly delete that information. If you believe that we may have collected information from or about a child under 18, please contact us at contact@hedgia.net.

8. Your Rights Regarding Your Information

Depending on your jurisdiction, you may have certain rights regarding your personal information. These rights may include:

- **Right to Know:** The right to request what personal information we have collected about you, including categories of personal information, categories of sources, business or commercial purpose for collecting, categories of third parties to whom we disclose, and specific pieces of personal information collected.
- **Right to Delete:** The right to request that we delete personal information that we have collected about you, subject to certain limitations (e.g., retention for legal obligations, fraud prevention, or ongoing service provision).

- **Right to Correct:** The right to request the correction of inaccurate personal information we maintain about you.
- **Right to Opt-Out of Sales and Sharing:** The right to opt-out from the "sale" or "sharing" of personal information as defined by certain state privacy laws. As stated in Section 4, Hedgia does not engage in the sale or sharing of personal information for cross-context behavioral advertising.
- **Right to Limit Use and Disclosure of Sensitive Personal Information:** The right to limit the use and disclosure of sensitive personal information. As noted in Section 2(d), our use of sensitive information is limited to necessary business purposes.

How to Exercise Your Rights and Verification Process:

To exercise any of these rights, please contact us using the contact information in Section 9.

When you submit a request, we will take steps to verify your identity to the degree of certainty required by applicable law. This may involve:

- Matching at least two or three data points you provide against information we already have in our records (e.g., your email address, phone number, account information, or details about your use of our services).
- For more sensitive requests (e.g., request for specific pieces of personal information), we may require a signed declaration under penalty of perjury that you are the individual whose personal information is the subject of the request.
- We may also ask you to send the request from the email address associated with your account or require additional information to verify your account.

If we cannot verify your identity to a sufficient level of certainty, we will promptly let you know and explain why. If we decline to take action on a valid request, you may have the right to appeal our decision by submitting an appeal request to the same contact methods.

Regarding Data Processed by Persona: If your request relates specifically to the sensitive identity verification data (e.g., biometric information, government IDs) that Persona collects and stores directly as part of their service to Hedgia, you should consult Persona's Privacy Policy and direct such requests to Persona, as they are the primary holder of that data.

9. Changes to Our Privacy Policy

We will post any updates to this Privacy Policy on this page, with the most recent revision date noted at the top. You are responsible for reviewing this Policy periodically to stay informed about any changes. By continuing to use the Platform after changes are posted, you agree to the updated Privacy Policy.

10. Contact Information

If you have questions or comments about this Privacy Policy, our privacy practices, or wish to exercise your privacy rights, please contact us at:

contact@hedgia.net