# **PRIVACY POLICY**



FACTS	WHAT DOES REPUBLIC CAPITAL GROUP DO	WITH YOUR PE	<b>RSONAL INFORMATION</b> ?
Why?	Financial-related companies, including Republic C "Republic", "us", "we", or "our"), choose how they s state privacy laws (collectively, "Privacy Laws") g employees, and other individuals, the right to limit require us to tell you how we collect, share, and pro this notice carefully to understand what we do.	hare your perso ive consumers, some but not al otect your perso	nal information. Federal and including clients, investors, I sharing. Privacy Laws also nal information. Please read
What?	<ul> <li>In connection with our due-diligence and advisory services, we may collect information about you including your:</li> <li>Name, mailing and email addresses</li> <li>Social Security number and income</li> <li>Customer experience or employment information</li> </ul>		
How?	All financial-related companies need to share customers' personal information to run their everyday business and we use the personal information we collect from you for our everyday business purposes. These purposes may include, for example: to provide due diligence and advisory services to our clients and to respond to your email or online inquiries, court orders, regulatory inquiries, and legal investigations. In the section below, we list the reasons financial and related companies can share their customers' personal information; the reasons Republic chooses to share; and whether you can limit this sharing.		
Reasons we can share your personal information		Does Republic share?	Can you limit this sharing?
For our everyday business purposes— such as to provide due diligence and advisory services to our clients and to respond to consumer inquiries through third-party chat services on our website, court orders, regulatory inquiries and legal investigations.		YES	NO
For our marketing purposes— to offer our products and services to you		NO	We don't share
For joint marketing with other financial companies		NO	We don't share
For our affiliates' everyday business purposes— to provide due diligence and advisory services to our clients and respond to consumer inquiries through third-party chat services on our website.		YES	NO
	tes to market to you	NO	We don't share
To limit our sharing or for questions       Call +1-212-862-5050, Visit republiccapgroup.com/privacy, or Email operations@republiccapgroup.com         Who we are       Who we are			
Who is provid this notice?	ding Republic Capital Group Holding LLC (the "Co its affiliates.	mpany", "Repub	lic", "us", "we", or "our") and
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What we do		
How does Republic protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with state and federal laws. These measures include computer safeguards and secured files and buildings.	
How does Republic collect my personal information?	<ul> <li>We collect your personal information, for example, when our clients:</li> <li>Provide your information for due diligence or advisory services</li> <li>We also collect your personal information from others, such as affiliates or other companies. Additionally, we collect your personal information directly from you when you submit an inquiry to us through email, online form on our website, or via through a third-party chat service on our website.</li> </ul>	
Why can't I limit all sharing?	<ul> <li>Federal law gives you the right to limit only:</li> <li>sharing for affiliates' everyday business purposes</li> <li>affiliates from using your information to market to you</li> <li>sharing for nonaffiliates to market to you</li> <li>State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.</li> </ul>	
What happens when I limit sharing for an account I hold jointly with someone else?	We do not hold accounts for you or individuals. Regardless, your choices will apply to specific people identified in a request.	
Definitions		
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies.	
Nonaffiliates	<ul> <li>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</li> <li><i>Republic does not share with nonaffiliates so they can market to you.</i></li> </ul>	
Joint marketing	<ul> <li>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</li> <li><i>Republic doesn't jointly market.</i></li> </ul>	

#### Other important information

Republic is chartered under the laws of the State of Texas and by state law are subject to regulatory oversight by the Texas Attorney General. Any consumer wishing to file a complaint against Republic should contact the Texas Attorney General's Office through one of the means indicated below:

By Mail at P.O. Box 12548, Austin, TX 78711-2548 or through the Department's website at https://www.texasattorneygeneral.gov/consumer-protection/file-consumer-complaint

#### For Residents from Canada

Canada's Personal Information Protection and Electronic Documents Act ("PIPEDA") does not apply to us but provides rights to individuals that we voluntarily provide, including the right to access what Personal Information we have collected from you, the ability to correct any inaccurate Personal Information, learn about our collection and usage of Personal Information, identify who within the organization is responsible for the protection of Personal Information, confirm we use and disclose your Personal Information in an appropriate manner, ensure we follow your consent regarding your Personal Information, and report to you if your Personal Information rights are knowingly violated.

<u>Complaints under the PIPEDA</u>. We hope that we can resolve any query or concern you raise about our use of your information. The PIPEDA also gives you right to lodge a complaint with the Office of the Privacy Commissioner of Canada. To learn more about lodging a complaint, you may visit: https://www.priv.gc.ca/en/report-a-concern/file-a-formal-privacy-complaint/file-a-complaint-about-a-business/

#### For Residents from the Following States:

#### California

The California Consumer Privacy Act ("CCPA") does not apply to us but provides rights to individuals that we voluntarily provide, including the right to know about the Personal Information we collected about you and how it is used and shared; the right to correct inaccurate Personal Information that we have about you; the right to delete Personal Information we collected from you (with some exceptions); the right to opt-out of the sale or sharing of your Personal Information; the right to limit the use and disclosure of Sensitive Personal Information collected about you; and the right to non-discrimination for exercising your CCPA rights. The CCPA also provides a right to a private cause of action to seek statutory damages against a business in limited circumstances involving the CCPA's reasonable security obligation. For more information regarding this private right of action, please see Section 1798.150 of the California Civil Code.

<u>Complaints under the CCPA</u>. We hope that we can resolve any query or concern you raise about our use of your information. The CCPA also gives you right to lodge a complaint with the California Privacy Protection Agency. To lodge a complaint, you may visit https://privacy.ca.gov/submit-a-complaint/ccpa-complaints/

#### Colorado

The Colorado Privacy Act ("CPA") does not apply to us but provides rights to individuals that we voluntarily provide, including the right to access, delete, and correct their personal data as well as the right to opt out of the sale of their personal data or its use for targeted advertising or certain kinds of profiling. Under the CPA, Colorado consumers will have the following enumerated rights with

respect to their Personal Information: the right to opt-out from the sale of their Personal Information, or use of Personal Information for targeted advertising and certain types of profiling; the right to know whether we are collecting Personal Information; the right to access Personal Information that we have collected about them; the right to correct Personal Information; the right to delete Personal Information; and the right to download and remove Personal Information from a platform in a format that allows the transfer to another platform. The CPA also places new obligations on covered entities to safeguard personal data, including the requirement to give Coloradans meaningful information about the collection and use of their Personal Information, to conduct data protection assessments, and to obtain consent before processing certain Sensitive Personal Information.

<u>Complaints under the CPA</u>. We hope that we can resolve any query or concern you raise about our use of your information. The CPA also gives you right to lodge a complaint with the Colorado Attorney General. To lodge a complaint, you may visit: https://coag.gov/file-complaint/

## Connecticut

The Connecticut Data Privacy Act ("CTDPA") does not apply to us but provides rights to individuals that we voluntarily provide, including the right to access Personal Information that we have collected about you; the right to correct inaccuracies in your Personal Information; the right to delete your Personal Information, including Personal Information that we collected through third parties; the right to obtain a copy of your Personal Information in a portable and readily usable format that allows them to transfer the data to another controller with ease; and the right to opt-out of the sale of your Personal Information, the processing of Personal Information for the purposes of targeted advertising, and profiling that may have a legal or other significant impact.

<u>Complaints under the CTDPA</u>. We hope that we can resolve any query or concern you raise about our use of your information. The CTDPA also gives you right to lodge a complaint with the Connecticut Attorney General. To lodge a complaint, you may visit:

https://www.dir.ct.gov/ag/complaint/e-complaint.aspx?CheckJavaScript=1?CheckJavaScript=1

## Delaware

The Delaware Personal Data Privacy Act ("DPDPA") does not apply to us but provides rights to individuals that we voluntarily provide, including the right to confirm whether we are processing the Opt-In Participant's Personal Information and provide access to the Opt-In Participant's Personal Information; the right to correct inaccurate Opt-In Participant's Personal Information; the right to delete Opt-In Participant's Personal Information; the right to obtain a copy of the Opt-In Participant's Personal Information; the right to obtain a list of the categories of third parties to which we disclosed the Opt-In Participant's Personal Information; and the right to opt out of the processing of the Opt-In Participant's Personal Information for purposes of targeted advertising, the sale of personal data or profiling in furtherance of solely automated decisions that produce legal or similarly significant effects concerning the consumer.

<u>Complaints under the DPDPA</u>. We hope that we can resolve any query or concern you raise about our use of your information. The DPDPA also gives you right to lodge a complaint with the Delaware Department of Justice. To lodge a complaint, you may visit: https://attorneygeneral.delaware.gov/fraud/cmu/complaint/

## Indiana

The Indiana Consumer Data Privacy Act ("INCDPA") does not apply to us but provides rights to individuals that we voluntarily provide, including the right to access Personal Information that we have collected about you; the right to correct inaccuracies in your Personal Information; the right to delete

your Personal Information, including Personal Information that we collected through third parties; the right to obtain a copy of your Personal Information in a portable and readily usable format that allows them to transfer the data to another controller with ease; and the right to opt-out of the sale of your Personal Information, the processing of Personal Information for the purposes of targeted advertising, and profiling that may have a legal or other significant impact.

<u>Complaints under the INCDPA</u>. We hope that we can resolve any query or concern you raise about our use of your information. The INCDPA also gives you right to lodge a complaint with the Indiana Attorney General. To lodge a complaint, you may visit: https://www.in.gov/attorneygeneral/consumer-protection-division/consumer-complaint/

### lowa

The Iowa Act Relating to Consumer Data Protection ("ICDPA") does not apply to us but provides rights to individuals that we voluntarily provide, including the right to access Personal Information that we have collected about you; the right to correct inaccuracies in your Personal Information; the right to delete your Personal Information, including Personal Information that we collected through third parties; the right to obtain a copy of your Personal Information in a portable and readily usable format that allows them to transfer the data to another controller with ease; the right to opt-out of the sale of your Personal Information, the processing of Personal Information for the purposes of targeted advertising, and profiling that may have a legal or other significant impact; and the right not to discriminated against for exercising your rights under the ICDPA.

<u>Complaints under the ICDPA</u>. We hope that we can resolve any query or concern you raise about our use of your information. The ICDPA also gives you right to lodge a complaint with the Iowa Attorney General. To lodge a complaint, you may visit: https://www.iowaattorneygeneral.gov/for-consumers/file-a-consumer-complaint

# Kentucky

The Kentucky Consumer Data Protection Act ("KCDPA") does not apply to us but provides rights to individuals that we voluntarily provide, including the right to access Personal Information that we have collected about you; the right to correct inaccuracies in your Personal Information; the right to delete your Personal Information, including Personal Information that we collected through third parties; the right to obtain a copy of your Personal Information in a portable and readily usable format that allows them to transfer the data to another controller with ease; and the right to opt-out of the sale of your Personal Information, the processing of Personal Information for the purposes of targeted advertising.

<u>Complaints under the KCDPA</u>. We hope that we can resolve any query or concern you raise about our use of your information. To lodge a complaint under the KCDPA, you may visit: https://www.ag.ky.gov/Resources/Consumer-Resources/Consumers/Pages/Consumer-Complaints.aspx

# Maryland

The Maryland Online Data Privacy Act ("MODPA"), will go into effect on October 1, 2025, does not apply to us but provides rights to individuals that we voluntarily provide, including the right to confirm whether a controller is processing the consumer's personal data and to access such personal data; to correct inaccuracies in the consumer's personal data; to delete personal data provided by, or obtained about, the consumer unless retention is required by law; to obtain a copy of the consumer's personal data processed by the controller, in a portable and, to the extent technically feasible, readily usable format that allows the consumer to transmit the data to another controller without hindrance, where the processing is carried out by automated means; to obtain a list of the categories of third

parties to which the controller has disclosed the consumer's personal data or a list of the categories of third parties to which the controller has disclosed any consumer's personal data if the controller does not maintain this information in a format specific to the consumer; and to opt out of the processing of the personal data for purposes of targeted advertising, the sale of personal data or profiling in furtherance of solely automated decisions that produce legal or similarly significant effects concerning the consumer.

<u>Complaints under the MODPA</u>. We hope that we can resolve any query or concern you raise about our use of your information. However, you can lodge a complaint with the Maryland Attorney General's office. To lodge a complaint, you may visit:

https://www.texasattorneygeneral.gov/consumer-protection/data-breach-

reporting#:~:text=Fill%20out%20the%20Data%20Breach,organization%20that%20experienced%20 the%20breach.

## Minnesota

The Minnesota Consumer Data Privacy Act ("MCDPA"), goes into effect on July 31, 2025, does not apply to us but provides rights to individuals that we voluntarily provide, the right to verify or confirm if a controller is processing their personal data; the right to rectify inaccuracies; the right to erase personal data; the right to receive a portable and easily usable copy of personal data; the right to obtain a list of the specific third parties to which the controller has disclosed a consumer's personal data or a list of third parties to whom the controller have disclosed any personal data, and the right to opt out of data processing for targeted advertising, personal data sales, or profiling that solely results in automated decisions with legal or similarly significant implications.

<u>Complaints under the MCDPA</u>. We hope that we can resolve any query or concern you raise about our use of your information. To lodge a complaint under the MCDPA, you may file a complaint by email at consumer.protection@state.mn.us or by phone at (651) 539-1600/

## Montana

The Montana Consumer Data Privacy Act ("MTCDPA") does not apply to us but provides rights to individuals that we voluntarily provide, including the right to confirm processing, right to access, right to correction of data, right to portability, right to deletion, right to opt out of targeted advertising, the sale of personal information, or profiling with legal or other significant effects.

<u>Complaints under the MTCDPA</u>. We hope that we can resolve any query or concern you raise about our use of your information. To lodge a complaint under the MTCDPA, you may visit: https://app.doj.mt.gov/OCPPortal/?q=node/395/

## Nebraska

The Nebraska Data Privacy Act ("NEDPA"), goes into effect on January 1, 2025, does not apply to us but provides rights to individuals that we voluntarily provide, including the right to verify if a controller is processing their personal data; the right to rectify inaccuracies; the right to erase personal data; the right to receive a portable and easily usable copy of personal data; and the right to opt out of data processing for targeted advertising, personal data sales, or profiling that solely results in automated decisions with legal or similarly significant implications.

<u>Complaints under the NEDPA</u>. We hope that we can resolve any query or concern you raise about our use of your information. To lodge a complaint under the NEDPA, you may visit: https://dhhs.ne.gov/Pages/hipaa.aspx</u>

#### **New Jersey**

The New Jersey Data Privacy Act ("NJDPA") does not apply to us but provides rights to individuals that we voluntarily provide, including the right to confirm whether a controller is processing the consumer's personal data and to access such personal data; to correct inaccuracies in the consumer's personal data; to delete personal data provided by, or obtained about, the consumer unless retention is required by law; to obtain a copy of the consumer's personal data processed by the controller, in a portable and, to the extent technically feasible, readily usable format that allows the consumer to transmit the data to another controller without hindrance, where the processing is carried out by automated means; to obtain a list of the categories of third parties to which the controller has disclosed the consumer's personal data or a list of the categories of third parties to which the information in a format specific to the consumer; and to opt out of the processing of the personal data for purposes of targeted advertising, the sale of personal data or profiling in furtherance of solely automated decisions that produce legal or similarly significant effects concerning the consumer.

<u>Complaints under the NJDPA</u>. We hope that we can resolve any query or concern you raise about our use of your information. However, you can lodge a complaint with the New Jersey Attorney General's office. To lodge a complaint, you may visit:

https://www.njconsumeraffairs.gov/Pages/Consumer-Complaints.aspx

### Oregon

The Oregon Consumer Privacy Act ("OCPA"), goes into effect on July 31, 2024, does not apply to us but provides rights to individuals that we voluntarily provide, the right to verify or confirm if a controller is processing their personal data; the right to rectify inaccuracies; the right to erase personal data; the right to receive a portable and easily usable copy of personal data; the right to obtain a list of the specific third parties to which the controller has disclosed a consumer's personal data or a list of third parties to whom the controller have disclosed any personal data, and the right to opt out of data processing for targeted advertising, personal data sales, or profiling that solely results in automated decisions with legal or similarly significant implications. The OCPA also gives consumers the right to revoke previously given consent to process the a consumer's personal data.

<u>Complaints under the OCPA</u>. We hope that we can resolve any query or concern you raise about our use of your information. To lodge a complaint under the OCPA, you may visit: https://www.doj.state.or.us/consumer-protection/contact-us/

### Tennessee

The Tennessee Information Protection Act ("TIPA"), goes into effect on January 1, 2025, does not apply to us but provides rights to individuals that we voluntarily provide, including the right to know whether a controller is processing the consumer's data and the right to access that data; request a controller correct inaccuracies in the consumer's personal data; delete personal data provided by, or obtained about, the consumer; obtain a copy of their personal data in a portable and readily usable format; and opt out of processing for the sale of personal data, targeting advertising or profiling.

<u>Complaints under the TIPA</u>. We hope that we can resolve any query or concern you raise about our use of your information. To lodge a complaint under the TIPA, you may visit: https://www.tn.gov/attorneygeneral/working-for-tennessee/consumer/file-a-complaint.html

#### Texas

The Texas Data Privacy and Security Act ("TDPSA") does not apply to us but provides rights to individuals that we voluntarily provide, including the right to confirm whether the controller is processing their personal data and provide them access to their personal data; correct inaccuracies in their personal data; delete personal data provided by or obtained about them; obtain a copy of the consumer's personal data that the consumer previously provided to the controller (i.e., data portability); and opt out of the processing of their personal data for targeted advertising, selling personal data about them, or profiling.

<u>Complaints under the TDPSA</u>. We hope that we can resolve any query or concern you raise about our use of your information. To lodge a complaint under the TDPSA, you may visit: https://www.texasattorneygeneral.gov/consumer-protection/data-breach-reporting

### Utah

The Utah Consumer Privacy Act ("UCPA") does not apply to us but provides rights to individuals that we voluntarily provide, including the right to confirm whether the controller is processing their personal data and provide them access to their personal data; correct inaccuracies in their personal data; delete personal data provided by or obtained about them; obtain a copy of the consumer's personal data that the consumer previously provided to the controller (i.e., data portability); and opt out of the processing of their personal data for targeted advertising, selling personal data about them, or profiling.

<u>Complaints under the UCPA</u>. We hope that we can resolve any query or concern you raise about our use of your information. To lodge a complaint under the UCPA, you may visit: https://dcp.utah.gov/ucpa/

### Virginia

The Virginia Consumer Data Protection Act ("VCDPA") does not apply to us but provides rights to individuals that we voluntarily provide, the right to confirm if the controller is actually processing their personal data; correct inaccuracies in the consumer's personal data that is collected by the controller; delete personal data provided by or obtained about the consumer; obtain copies of the personal data collected by the controller; and opt out of the processing of personal data for purposes of targeted advertising, the sale of personal data, or further profiling

<u>Complaints under the VCDPA</u>. We hope that we can resolve any query or concern you raise about our use of your information. To lodge a complaint under the VCDPA, you may visit: https://www.oag.state.va.us/consumer-protection/index.php/file-a-complaint

To learn more about our Privacy practices, please go to republiccapgroup.com/ privacy.