

# Privacy Policy

Dalmore Group, LLC, doing business as "DirectCF", brings together prospective investors and companies seeking capital on its website [www.directCF.com](http://www.directCF.com) (the "Portal"). This Privacy Policy ("Privacy Policy") demonstrates and confirms our commitment to your privacy and describes the types of personal information we may collect about you in the context of your use of the Portal, the purposes for which we use the information, the circumstances in which we may share such information with third parties, and the limitations on our use of that information. Whether you are a prospective investor, company seeking capital, casual visitor or a registered user of the Portal, your use of the Portal is governed by the DirectCF Terms of Use, as well as this Privacy Policy and other operating rules, minimum qualifications and cautions posted on the Portal or presented to you individually during the course of your use of the Portal.

We urge you to read this Privacy Policy in its entirety. As used throughout this policy, the term "DirectCF," "we", "our" or "us" refers to Dalmore Group LLC. The security of all of the information associated with visitors to our Portal is of great concern to us. Although perfect security does not exist in any transaction on line, the Portal has security measures in place to protect the loss, misuse, or alteration of the information under our control. Rest assured that we review our security processes on a regular basis to keep them up to date with the highest levels of security encryption and service.

## Collection of Personal Information

In the course of operating the Portal, we will collect and receive) the following types of information which you authorize us to collect and receive by using or visiting the Portal:

- Personal Information

When you register with the Portal, you will be required to provide us with personal information about yourself (collectively, the "Personal Information"). Such Personal Information may include your name, address, e-mail address, phone number, and other information that helps to identify you. If you register with the Portal using a social media account, you are authorizing us to collect, store, and use, in accordance with this Privacy Policy, any and all information you agreed such social media company could provide to us through its Application Programming Interface ("API"). Such information may include, without limitation, your first and last name, username, profile picture, unique social media identifier and access token, and e-mail address.

- Transaction Information

If you engage in an investment transaction ("Transaction") through the Portal, we will collect information about your Transaction, including the date and time of the Transaction, the Transaction amount, the securities or other investment product purchased or sold, and related information about the Transaction (the "Transaction Information").

- Other Information

We may collect additional information (collectively, the “Other Information”) including the following:

A. From You:

- (From prospective Investors): Additional information about you that you voluntarily provide to us, including, without limitation, information in your user profile, such as household income range, personal interests, and your investment preferences.
- (From companies seeking capital): Additional information about your company and yourself that you voluntarily provide to us, including, without limitation, information in your user profile, financial and organizational information, your business information, “pitches,” fundraising goals, social media links, biographical information, and information concerning the company’s ownership.

B. From Your Activity:

- Additional information that we automatically collect when you use the Portal, including, without limitation: (i) your device’s IP address, which may consist of a static or dynamic IP address and will sometimes point to a specific identifiable computer or device; (ii) browser type and language; (iii) date and time of use; and (iv) other details regarding your activity on the Portal, amount of time spent on the Portal, pages viewed, information derived from what you post on or with whom you interact via the Portal, and other performance and usage data.

C. About Your Device:

- We may collect the following information regarding the device you use to connect to the Portal: (i) the type of device; (ii) Advertising Identifier (e.g., “IDFA” or “AdID”); (iii) operating system and version (e.g., iOS, Android or Windows); (iv) carrier; (v) Geo-location; and (vi) network type.

D. Third-Party Analytics:

- We use third-party analytics services (such as Google Analytics) to evaluate your use of the Portal, compile reports on the activity of our visitors, collect demographic data about you and other visitors, analyze performance metrics, and collect and evaluate other information relating to the Portal and mobile and Internet usage. These third parties like Google Analytics use cookies and other technologies to help analyze and provide us the data. By using the Portal you consent to the processing of data about you by these analytics providers in the manner and for the purposes set out in this Privacy Policy.

For more information on these third parties, including how to opt out from certain data collection, please visit the sites below. Please be advised that if you opt out of any service, you may not be able to take advantage of the full functionality of the Portal.

- E. From Other Sources. Additional information that we collect or receive from third-party sources in accordance with their privacy policies.

## Use and Sharing of Information

DirectCF may use your Personal Information, Transaction Information and Other Information (collectively, "Information") for the following purposes:

- Providing access to the investment opportunities made available on the Portal: We use your Information to make available to you the investment services of the Portal.
- Improving the Portal: We use your device and online identifiers, information about your internet, browser, and network activity, and location data to measure the technical site performance of the Portal, to provide operational and technical support and development of our business, including to improve or enhance our services, and evaluate customer service, efficiency and cost, as well as for risk management purposes. We also track, and transmit to our web servers, some information about your server address, web browser, and computer system so we can operate and improve our Portal. For example, we track the number of people who visit each page of the Portal, the order in which they view the pages, and other information, to learn which features are the most popular and to refine the Portal's design. We maintain that information on an aggregated or collected basis.
- Monitoring: We use your Information for monitoring purposes, such as keeping records of investment transactions, to comply with regulatory or self-regulatory practices and applicable laws, and for other purposes permissible under applicable law.
- Marketing: We use information about your internet, browser, and network activity for marketing purposes.
- Operating the Portal: We use your IP address, location data, and internet, browser, and network activity to enable our Portal metrics for site administration and management purposes.
- Detecting Cybersecurity Incidents and Fraud: We use your Information to detect security incidents and protect against malicious, deceptive, fraudulent or illegal activity such as money laundering and other financial crimes.

We may share your Information with our business partners and affiliates for marketing purposes. We may also share some or all of your Information with any of our parent companies, subsidiaries, joint ventures, or other companies under common control with us.

We also may share your Information with third parties that provide services to help us with our business activities, including, without limitation, conducting company due diligence, maintaining databases, payment processing and customer service. These third parties are authorized to use your Information only as necessary to provide these services to us and to the extent permitted by law.

In the course of operating the Portal, DirectCF and its affiliates and business partners may also share your Information with others in the following circumstance:

- As required by law such as to comply with a subpoena, administrative order or similar legal process;
- When we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request or pursuant to a demand under the Digital Millennium Copyright Act and other intellectual property laws;
- Related to due diligence for a fundraising event; and
- If DirectCF is involved in a merger, acquisition, or sale of all or a portion of its assets, you will be notified via email or a prominent notice on our website, or both, of any change in ownership or uses of your Information, as well as any choices you may have regarding your Information.

Any information that you post to public areas of the Portal will be accessible to the public, and due to the nature and technology of the Internet, that information will remain available even after you delete the information from public posting.

### **Requesting to See Your Personal Information**

You may request via email, U. S. Mail or telephone that we provide you with the personal information we have about you. Once you receive this information, you may request that we modify, delete or remove any of your personal information. We reserve the right to verify your identity before sending you this information.

### **Cookies and Other Tracking Technologies**

The Portal may use cookies (small text tiles placed on your computer's hard disk by our server), for example, to keep track of your preferences and profile information, and to collect general usage and volume statistical information that does not include personal information. We will use this information only to assess how users are using our services so that we may better serve you. This data will also allow us to manage the functionality of the Portal, determine which of the Portal's features are most popular, and show you relevant content.

The Portal uses third parties to place cookies on your computer to collect non-personally identifiable information. This non-personally identifiable information allows us to compile aggregated statistics for our use, about visitors to the Portal, including without limitation Google web services.

If you do not want us to deploy cookies in your browser, you can opt out by setting your browser to reject cookies or to notify you when a website tries to put a cookie in your browser software.

### **Links to Other Web Sites**

The Portal includes links to other websites whose privacy practices may differ from those of DirectCF. If you submit Information to any of those sites, your Information will be governed by their privacy statements. We encourage you to read carefully the privacy statement and terms of use of any website you visit.

## **Security**

The security of your Information is important to DirectCF. We follow generally accepted industry standards to protect the Information submitted to us, both during transmission and once we receive it. No method of transmission over the Internet, or method of electronic storage, is 100% secure; therefore, we cannot guarantee its absolute security.

If you have any questions about security on our Web site, you can contact us at the address provided at the end of this Privacy Policy or elsewhere on the Portal.

## **Additional Policy Information**

Our website offers publicly accessible comment pages and forums. You should be aware that any information you provide in these areas may be viewed, read, collected, and used by others.

## **Updating/Accessing/Amending/Correcting Personally Identifiable Information**

If your personally identifiable information changes, you may correct, update, amend, delete, remove or deactivate the personally identifiable information or by emailing our Customer Support department at the address provided at the end of this Privacy Policy or elsewhere on the Portal.

## **Children Prohibited from Using Portal**

DirectCF and the Portal are not directed to children and we do not seek to engage with nor intentionally collect any information from children. If you are under the age of 18, please do not give us any Personal Information. If you have any concerns about your child's privacy, please contact us at [support@directCF.com](mailto:support@directCF.com). We will take steps to delete the information as soon as possible should we learn that we have unintentionally collected personal information from your child without your consent.

## **Data Retention**

DirectCF and its partners will retain your Information for as long as your account is active, as needed to provide you services, or longer if and as required by applicable law. If you wish to cancel your account or request that we no longer use your Information to provide you services, please contact us at the information provided at the end of this Privacy Policy or elsewhere on the Portal. We will retain and use your Information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

## **California Residents**

Under California Civil Code Section 1798.83 (known as the California Consumer Privacy Act ("CCPA")), California residents who have an established business relationship with DirectCF may choose to opt out of our sharing your Personal Information with third parties for direct marketing purposes. If you are a California resident and (1) you wish to opt out of such sharing; or (2) you have questions about our disclosure of your Personal Information to third parties for the direct marketing purposes, please send

an e-mail to support@directCF.com.

If you are a resident of California, you have certain rights in relation to your Personal Information pursuant to the CCPA. These rights include your right to:

- Request information about the Personal Information that we collect about you and the manner in which we process and disclose that information;
- Obtain the specific pieces of Personal Information that we have collected about you in the 12 months preceding your request;
- require us to delete certain Personal Information that we have collected about you;
- Opt out of the disclosure of your Personal Information to third parties under certain circumstances; and
- Not be discriminated against as a result of exercising any of the aforementioned rights.

California law requires us to verify the requests we receive from you when you exercise certain of the rights listed above. To verify your request, we will check the information you provide us in your request against third party identity verification tools. As part of this process, we may call you after you submit your request to verify information. You may also designate an authorized agent to exercise certain of the rights listed above on your behalf by providing the authorized agent with power of attorney pursuant to the California Probate Code or by executing other documentation we may require. The authorized agent may make the request on your behalf by following the instructions above. If an authorized agent submits a request on your behalf, we will contact you to verify that they represent you.

California law requires that we describe certain disclosures of Personal Information where we receive valuable consideration. California law treats such disclosures as “sales” even if no money is exchanged. We do not sell information to third parties as California law defines sales.

California residents should be aware that the CCPA does not apply to: Personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) and its implementing regulations, the California Financial Information Privacy Act (FIPA), and the Driver’s Privacy Protection Act of 1994, or other information subject to a CCPA exception.

#### **Notice about the European Union’s General Data Protection Regulations (the “GDPR”)**

You may have certain rights under the European Union’s GDPR 2016/697, for example, if you are data subject in the European Union protected by the GDPR. These rights are in addition to the commitments we are making elsewhere in this policy to safeguard your privacy. The GDPR is a complex regulatory scheme and we do not intend to provide every detail here. If you are interested in the GDPR you should read the GDPR itself and the relevant guidance provided by the applicable authorities for a fuller explanation. The GDPR applies to businesses that market their products and services to people in the EU or monitor the behavior of people in the EU. We wish to assure visitors to our Protocol that we have put in place processes and procedures to comply with the GDPR.

The GDPR provides the right, where applicable, to access your Personal Data (as defined in the GDPR), to have it rectified or erased, to object and withdraw your consent to the processing of your Personal Data, and to data portability, and you do not have to provide reasons for exercising these rights.

Where applicable, and providing we do not impinge the rights of anyone else, we will supply you with one copy of your Personal Data. Please note however that the GDPR provides exceptions and exclusions to the right to erase Personal Data such as when necessary for the exercise of free expression and information, to comply with a legal obligation, or to establish, exercise or defend a legal claim.

If you object to the processing of your Personal Data, we shall stop that processing unless we can demonstrate compelling and legitimate grounds to process the information that override your interests, or if the processing is intended to establish, exercise or defend a legal claim, or to protect the rights of others.

If you believe that our processing of your Personal Data infringes a data-protection statute, rule or regulation, you may lodge a complaint with the appropriate authorities responsible for data protection. If applicable, you may lodge that complaint in the European Union member state of your habitual residence, your workplace, or the place of the alleged infringement.

To the extent that we base our processing of your Personal Data on your consent, you may withdraw that consent at any time. But your withdrawal of that consent will not affect the lawfulness of any processing we do before your withdrawal of consent.

### **Changes to our Privacy Policy Notices**

We reserve the right to amend (that is, to add to, delete from, or change) the terms of this Privacy Policy at any time. We always post our Privacy Policy, as in effect from time to time, on our website. By electing to become one of our customers or by receiving our products and related services, you agree to receive copies of our Privacy Policy and any amendments to it from our website, unless you notify us otherwise in writing at the address provided below.

### **How to Contact Us**

If you have questions regarding this Privacy Policy, or to opt out of the sharing of your Personal Information with third parties as permitted under this Privacy Policy, please contact us at [support@directCF.com](mailto:support@directCF.com). Please include "DirectCF Privacy Policy" in the Subject line of your inquiry.

Our mailing address for purposes of this Privacy Policy is:

Dalmore Group, LLC  
1177 Avenue of the Americas, 7th floor  
New York, NY 10036

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