

This Privacy Policy (“Privacy Policy”) describes how we ‘Family Office Club’ collect, use, disclose, and transfer the information that you provide to us or that we collect about you when you access and use our website at www.FamilyOffices.com (the “Website”), or our Family Office Club benefits and services (the “Services”), or use our Services provided through the Website (“Online Services”).

Information we gather on you & how it is used:

Visitors

While parts of the Website may be used without registration, your use of the Online Services and much of the Website content requires registration. You may choose not to provide us with any Personal Information. However, you will not be able to use those portions of the Website that require your Personal Information and registration.

If you use our Website as a visitor without registering or sending us inquiry information, the only information we collect will be automatic tracking information (please see Automatic Information We Collect About You in Section 2 below).

Registered Users and Prospects

Registered users are those visitors to our Website who seek to register for our reports or other limited free offerings on the Website.

By 'prospects,' we mean individuals at companies who have shared their contact information with us, whether through a form on our website, information collected at a trade or marketing event, or who have reached out to us directly.

For both prospects and registered users, we may collect information that may personally identify you, including, but not limited to your contact information including name, job title, organization, address, e-mail address, or phone. Additionally, we may collect general information related to your business objectives, user preferences, and Website and event participation details.

For registered users only, we may also collect information using cookies that help us understand what you are viewing and responding to on our website once you have already provided us with your Personal Information. Once your activity rises to a point that indicates to us that you might have a reasonable interest in our information, our internal CRM system will alert our sales team to reach out to you.

We use the Personal Information to manage our relationship with you including responding to your questions and social media communication, providing you with the specific

Services you select, if applicable, and providing you with information about our company and Services.

If you no longer wish to receive emails from us, you may opt-out of receiving them at any time by following the instructions included in the link at the bottom of each sent email, (OR) by contacting us at clients@familyoffices.com

1. Inquirers

We may also collect information that personally identifies you when you email us or otherwise correspond with us, such as when you send us email communications, letters, or make inquiries on our website, or when you use the “Contact Us” option. Any information you provide will be used to respond to your inquiries. As part of our services, we collect, use, transfer, and distribute publicly available data on global investors for our business clients and partners in the private wealth, institutional, finance industries, and educational institutions.

INFORMATION WE AUTOMATICALLY COLLECT FROM YOU

Even if you do not register on www.FamilyOffices.com, we collect information about your use of our Website in order to further personalize the content and information we present to you.

Cookies

“Cookies” are small computer files that are transferred to your computer, mobile device or iPad that contain information such as your user ID, user preferences, the pages you’ve visited, and the activities you’ve performed while using the Website. We use “session cookies” to customize your experience on the Website and, if you create a password, we use “persistent cookies” to store your password so you do not have to re-enter it each time you visit the Website. We do not link the information stored in cookies to any of your Personal Information you submit while on the Website. You have the right to choose whether to accept cookies. You may block cookies or delete cookies from your browser; however, by disabling cookies, you may not have access to all the features of the Website. You also have the option to browse our website using free cookie blockers like Ghostery or the “Incognito Mode” function in Chrome. Some of our business partners also use cookies to provide us with anonymous data and information regarding your use of the Website. We do not have access or control over these cookies.

Traffic Data

We automatically track and collect the following categories of information when you visit our Website: (1) Internet Protocol (IP) addresses; (2) domain servers; (3) computer, device and connection information, such as browser type and version, operating system, mobile platform and unique device identifier (UDID) and other technical identifiers; (4) Uniform Resource Locator (URL) clickstream data, including date and time stamp, referring and exit URLs, search terms you used and pages you visited or search for on the Service; (5) for location-aware Services, the region, city or town where your device is located in order to provide you with more relevant content for where you are in the world; (5) referring source which may have sent you to the Website; and (6) other information associated with the interaction of your browser and the Website. If you are using mobile or other devices to visit the Website, we may collect hardware information related to the device about you.

If you do not wish to opt-out of information automatically collected by us, please contact us at clients@familyoffices.com

AI Tool Usage

We use custom GPT-powered AI tools as part of our services. By purchasing a membership and using these tools through our website, you agree to this privacy policy. Family Office Club does not have access to your submissions, does not save them, and does not know what you have entered or what responses you receive. All interactions are private from our end.

We have disabled the setting that would allow OpenAI to use inputs from our custom GPTs for training purposes. However, because these tools are provided by large technology companies (such as OpenAI, Microsoft, or Google), we cannot control or predict the extent to which they may use metadata or user interaction data in their broader systems. This uncertainty is common across the technology industry, and we want to be transparent about it.

To the best of our knowledge and configuration ability, your inputs and outputs through our AI tools remain private from Family Office Club. We cannot toggle visibility into submissions, and we do not monitor or record them in any way.

LINKS TO OTHER WEBSITES

The Website may contain links to third party websites to which Family Office Club has no affiliation. Family Office Club does not share your personal information with those websites and is not responsible for their privacy practices.

DISCLOSURE OF YOUR INFORMATION

By registering with our Website, you agree that we may share certain categories of information we collect from you in the ways described in this Privacy Policy. We share Personal Information and Traffic Data with our business partners who assist us by performing core services (such as website hosting, data storage, and security) related to our operation of the Website and/or by making certain Services available to our users. Those business partners shall be bound to uphold the same standards of security and confidentiality that we have promised to you in this Privacy Policy, and they will only use your contact data and other Personal Information to carry out their specific business obligations to you and to provide you with website-related services. Family Office Club does not share, sell, rent, or trade your Personal Information with any third parties for their promotional purposes.

We reserve the right to disclose your personally identifiable information as required by law and when we believe that disclosure is necessary to protect our rights or property, to mitigate our liability in an actual or potential lawsuit, to comply with a judicial proceeding, court order, or legal process served on our Website, to enforce this Privacy Policy or our Terms of Use or any other agreement in place between you and Family Office Club, or to investigate and prevent unauthorized transactions or other illegal activities.

RETENTION PERIOD

Family Office Club will retain Personal Data about you for the period reasonably necessary to fulfill the purposes described in this Privacy Policy and consistent with its retention policy and as required or permitted by law.

FOR EEA CITIZENS

European Union (EU) data protection law regulates the transfer of EU customer personal data to countries outside the European Economic Area (EEA), which includes all EU countries and Iceland, Liechtenstein, and Norway.

Basis for Processing

Family Office Club processes data under this Privacy Policy based on (a) consent of the user as a condition of accessing this Website; (b) the necessity of the data for entering into a contract for Services; and/or (c) the necessity of the data for performing the Services. IF YOU DO NOT CONSENT TO THE PROCESSING OF YOUR DATA IN ORDER TO ACCESS AND USE THE FAMILY OFFICE CLUB WEBSITE (www.FamilyOffices.com), PLEASE DO NOT USE, OR ENGAGE WITH, FAMILY OFFICE CLUB WEBSITES.

Cross-Border Transfer

Data centers hosting your data under this Privacy Policy are located within the United States. Accordingly, as an EEA citizen, in order to access the Services and content provided by FAMILY OFFICE CLUB, your data may be transferred outside of the EU. You consent to the cross-border transfer of your data in order to receive access to the Family Office Club website and/or Services.

The EU Standard Contractual Clauses (“SCCs”) are standardized contractual terms approved by the European Commission for use in agreements between service providers (such as Family Office Club) and their clients or partners. They ensure that any personal data transferred outside of the European Economic Area (EEA) is handled in compliance with the requirements of the EU General Data Protection Regulation (EU) 2016/679 (“GDPR”). The SCCs provide appropriate safeguards for international data transfers and replaced the prior model clauses that were based on the now-repealed EU Data Protection Directive 95/46/EC.

HOW YOU CAN ACCESS, CHANGE OR SUPPRESS YOUR PERSONAL DATA

If you would like to review, correct, update, suppress, delete or otherwise limit our use of your Personal Data that has been provided to us, you may make a request by contacting us using the information provided in the Contact Information for Family Office Club below. For your protection, we may need to verify the request is valid. We will try to comply with your request as soon as reasonably practicable and consistent with applicable law.

If you completely delete all such information, your account may become deactivated. Please note that we may need to retain certain information for record-keeping purposes and/or to complete any transactions that are pending.

CHANGES TO THIS PRIVACY POLICY

We reserve the right, at any time, to add to, change, update, or modify this Privacy Policy so please review it frequently. If we make a material change to our Privacy Policy, then we will notify you by email, here on this page, as well as by posting a notice on our website. In all cases, the use of the information we collect is subject to the Privacy Policy in effect at the time such information is collected. If you do not agree with any changes or modifications to the Privacy Policy, please do not continue using the Website. You will be deemed to have consented to any modification of the Privacy Policy when you use the Website after the effective date of the modification.

CONTACT INFORMATION

If you have any questions about this Privacy Policy or your dealings with this website, or want to request access or changes to our handling of your data or lodge a complaint, please contact us at clients@familyoffices.com or send mail to:

Family Office Club

111 Hekili Street, Suite A-114

Kailua, HI 96734

United States of America

Subject: Data Inquiry

INFORMATION ON WHAT WE COLLECT ON OUR INVESTOR PROFILE SUBJECTS

- **WHO YOU ARE**

Notice to Prominent Individuals and High-Net-Worth Data Subjects

As part of our data intelligence research, we collect and process information about individuals who fall within the wealthy class (through direct or pooled family wealth) and/or those who hold public prominence such that businesses, organizations, and institutions may seek to engage with them for investment opportunities, philanthropic initiatives, or other professional purposes.

If your personal data has been collected, it is because we believe such data may be of relevance and value to our clientele. Due to the prominence of the individuals concerned and the scope of data collected, it is not feasible to contact each individual data subject directly to inform them of their rights under the General Data Protection Regulation (EU) 2016/679 (“GDPR”) or the United Kingdom’s equivalent legislation. Accordingly, we are making this notice publicly available on our website.

While the GDPR formally applies only to data subjects in the European Union and the United Kingdom, we provide this notice more broadly for transparency and to assist any data subject who may be covered by other applicable data protection laws, or who simply wishes to understand how we process their data and their rights, including the right to review and request corrections.

- **WHO WE ARE AND WHO OUR CUSTOMERS ARE**

We are an investor data intelligence research firm focused on single-family and multifamily office companies. We provide helpful, informative research about family offices to our business clients in the investment industry, as well as to non-profits and educational institutions (our “Customers”). Our Customers are organizations seeking business relationships with you or aiming to strengthen existing ones. Our

research is designed to help these Customers gain a better understanding of you, your general and investment interests, and your inclinations: a) so they can assess whether there is a good fit between you and their offerings; b) to help tailor their offerings and initial outreach to connect more effectively with you; c) to improve their communication and services to enhance your experience and ensure it is personalized to meet your needs and expectations.

- THE RESEARCH DATA WE COLLECT
- For our investor research, we gather data directly from investors, along with publicly accessible sources including, but not limited to: Public Registers, Trade and Industry References, Professional Directories, Reliable print and broadcast media, and internet company websites (we do not use blogs or user-edited content).

Conference attendance information & speakers

The bulk of our research is focused on compiling this publicly available data on single and multi-family office investors.

CATEGORIES OF DATA COLLECTED & STORAGE

The publicly available data we collect about you relates to areas our Customers find helpful in establishing a business relationship with you.

In addition to providing your name and business contact information, we provide your biography, business and investment history, previous places of employment, potential investment areas of interest, past areas of investment, and general location information.

We do not collect any information such as religion, nationality, or political affiliations as outlined in Article 9 of the GDPR.

Upon collection, the data is stored in our database, which is located on a secure server managed and secured by Amazon Web Services (AWS). We take appropriate technical and organizational measures to ensure that your data remains protected. AWS is a leading provider of cloud servers and prides itself on its state-of-the-art security. You can read more about its security practices at <https://aws.amazon.com/security/>.

Once the data collection is completed, we use it to prepare a commercially-available research offering what we call “investor profiles” that we sell to our Customers.

Our dossiers are distributed to our Customers via a written signed contract that requires that Customers a) use the investor profiles for lawful purpose; b) use the investor profiles for their internal business purpose only; c) maintain the confidentiality of the investor profiles.

Accordingly, we do not broadly publish or disseminate the investor profiles to the public nor do we seek to use the information to embarrass you or harm your reputation. Our goal is to respectfully provide limited access to the investor profiles to a target business audience who can hopefully provide you with a service or offering that appeals to you.

LEGITIMATE INTEREST

As part of our obligation under the GDPR, we have performed a comprehensive review of our data processing activities pursuant to a privacy impact assessment and believe that our processing is justified based on the legitimate interests of our customers and our business; further that such interests are not overridden by your rights and freedoms, particularly given your resources, newsworthiness, and prominence when balanced against the restricted and respectful, narrowly-tailored use we make of your data.

RETENTION OF YOUR DATA

Since we are in the business of providing intelligence-gathering research on the wealthy, so long as you meet our criteria, we will maintain your data in our secure database. Periodically, we will clean up our database and remove data and dossiers that no longer meet these criteria or that we no longer believe is useful.

INTEGRITY OF YOUR DATA

As mentioned above, we use a criteria-based process within our data gathering system designed to ensure data accuracy. Despite these efforts, we cannot guarantee the accuracy of all our records. However, we regularly review the data and make updates when we find or are informed of errors or necessary corrections. Much of the data we collect is historical and does not require updating.

ACCESS AND CORRECTION OF YOUR DATA

If you are in the EU, UK or in a country that provides access and correction rights, we welcome your request to access, correct or update your data that we hold about you. You can request that we delete your information with respect to data that does not meet a lawful justification for processing as well. If you wish to exercise these rights, please contact us at clients@familyoffices.com with a subject line that reads: "Data Privacy".

CHANGES TO OUR POLICY

We reserve the right to make changes to this Privacy Policy as needed to reflect our practices and/or to comply with the law.

MORE INFORMATION

Thank you for taking the time to read through all of this. If you have questions regarding this policy or privacy practices at Family Office Club and our flagship product, Family Office Club, or would like a copy of the information we hold on you, please contact us at clients@familyoffices.com with a subject line reading: “Data Privacy”.

This Website Uses Cookies

We use necessary cookies that enable this website to function properly. We also utilize cookies to help analyze our traffic and better understand the content preferences of our users. In addition, we share information with our social media, advertising, and analytics partners who may combine it with other information you have provided them or that they have collected from your use of their services. You consent to our cookies if you continue to use this website. If you wish to refrain from the use of our cookies, please close out the website and send an email to: clients@familyoffices.com with a subject line reading: “Cookie Removal” and we will remove any stored cookies we have on you within 24 hours of the request.

GENERAL REQUESTS OR CONCERNS

If you would like us to address a specific action or request not outlined above, please email us directly at: clients@familyoffices.com, referencing your request. We will respond within 5 business days. As always, we will do our best to address any data or privacy concerns you may have and are committed to being lawful and transparent with our data collection and usage. Thank you.