

## PRIVACY POLICY

*Effective Date: August 23, 2022*

BaseFund, LLC (“BaseFund,” “we,” “us,” or “our”) owns and operates the BaseFund websites and other services and platforms that link to this Privacy Policy (collectively, the “Platform”). BaseFund values and respects the privacy of its customers and visitors (“User,” “You,” “you,” or “your”). BaseFund is committed to the privacy of your information. The purpose of this Privacy Policy is to provide you with information about BaseFund’s policies regarding the collection, processing, use, storage, and disclosure of information when you access our Platform. This Privacy Policy also describes how you may contact us if you have further questions about BaseFund’s use of your information. This Privacy Policy also describes the choices you can make about our use of your information.

We may update or modify this Privacy Policy at any time, by posting the updated version including the effective date of the updated version. Please review this Privacy Policy periodically for any updates or changes. This Privacy Policy is binding on all those who access our Platform, whether acting as an individual or on behalf of an entity, including you and all persons, entities, or digital engines of any kind that harvest, crawl, index, scrape, spider, or mine digital content by an automated or manual process or otherwise. Please read this Privacy Policy carefully. Your continued use of the Platform is considered your acceptance of these terms, and you agree to the terms of this Privacy Policy and the collection and use of information in accordance with this Policy. If you do not agree to be bound by this Privacy Policy or any subsequent modifications, you should not access our Platform or disclose any personal information through our Platform. This Privacy Policy is incorporated into our [Terms of Use](#).

### 1. How to Contact Us

If you have any questions or concerns about our use of your Personal Information (defined below), please do not hesitate to contact us through any of the methods below.

**Email:** [privacy@basefund.com](mailto:privacy@basefund.com)

**Mail:** BaseFund, LLC., P.O. Box 430, Buffalo Gap, TX 79508

**Attn:** President

### 2. Personal Information

While using our Platform, we may ask you to provide us with certain personally identifiable information (“Personal Information”). Personal Information is information that identifies, relates to, describes, can reasonably be associated with, or can reasonably be linked to a particular individual or household.

We collect information from you both when you provide it voluntarily and also automatically when you access our Platform. We may also collect Personal Information from other sources, as described below.

We may collect Personal Information from you and any devices (including mobile devices) you use when you: use our Platform, perform a transaction, register for an account, subscribe to a newsletter, contact BaseFund via phone, email, postal mail, or other means, connect with BaseFund’s social media pages, respond to BaseFund’s communications to you, such as surveys or requests for feedback. Please remember that any information that is disclosed in public comments, forums or other areas enabling other users to submit comments (“Forums”) becomes

public information, is not maintained or treated as confidential, and you should exercise caution when deciding to disclose your Personal Information.

In addition, we may also collect Personal Information about you from third parties in connection with our Platform, including from the following sources:

- Service providers (including hosting providers and payment processors)
- Data analytics and aggregation service providers (including financial modeling service providers and rating agencies)
- Email, chat, survey, feedback, and other communications service providers
- Customer service providers
- Social media platforms
- Regulatory organizations (including state and local regulatory resources)

If we combine or associate information from other sources with Personal Information that we collect through the Platform, we will treat the combined information as Personal Information in accordance with this Privacy Policy.

### 3. Information We Collect

We may collect the following categories of Personal Information from you, depending on your interactions with our Platform and the choices you make, as further described in the chart below:

Category	Data Types	
<b>Identifiers</b>	Name, email address, postal address, social media usernames, telephone number, organization name, and Internet Protocol (IP) address.	
<b>Interactions</b>	Records of transactions (including service payment invoices as applicable), and other information you post or otherwise submit to the Platform, including emails or other communications you provide to us.	
<b>Internet / Electronic Network Activity</b>	<b><i>Browser History</i></b>	Data about the webpages you visit, including without limitation web browser specifications, websites visited before accessing our Platform, and websites visited after leaving our Platform.
	<b><i>Device, Connectivity, and Configuration Data</i></b>	Data about your device and nearby networks, including internet connection information, computer equipment information, regional and language settings.
	<b><i>Geolocation Data</i></b>	Data about your device's location, which is inferred from your internet connection data, your IP address, and your postal address, or which you may choose to allow us to access by granting the Platform access to your location when prompted.
<b>Demographic Data</b>	Data about you such as your business or company information, professional reference contact information, social media URLs, and other data reflecting your preferences for our Platforms.	

Category	Data Types
<b>Third-Party Social Network Services</b>	If you choose to access, visit, and/or use any third-party social networking service(s) that may be integrated with our Platform, we may receive your Personal Information and other information about you and your computer, mobile, or other device that you have made available to those social networking services, including information about your contacts through those services. Some social networking services will facilitate registration or enhance or personalize your experience on our Platform. This includes if you “follow,” “like,” or link your social networking account to our Platform. Your decision to use a social networking service in connection with our Platform is voluntary. However, you should make sure you are comfortable with the information your third-party social networking services may make available by reviewing privacy policies of those providers and/or modifying your privacy settings directly with those networking services.

#### 4. How We Use Information

We generally process your information when we need to do so to fulfill a contractual obligation or where we or someone we work with needs to use your Personal Information for a reason related to their provision of services on our behalf. We only process Personal Information for such legitimate interests as further detailed in the chart below:

Collection Type	Description	How We Use Information Collected
<b>Newsletter Subscription Information</b>	You may provide your email address in order to receive our newsletter via email.	<ul style="list-style-type: none"> <li>To contact you with newsletters, marketing or promotional materials and other information that may be of interest to you.</li> </ul>
<b>Customer Service Information</b>	This may include any information that you choose to provide, whether by phone, email, mail, or chat, to our customer service representatives or other BaseFund employees.	<ul style="list-style-type: none"> <li>To provide, maintain, operate, personalize and improve our Platform and services.</li> <li>To evaluate and improve the content of our Platform.</li> <li>To respond to your questions and requests.</li> <li>To provide customer support.</li> <li>To allow you to participate in interactive features of our Platform when you choose to do so.</li> </ul>
<b>Demographic Data</b>	We may collect such Personal Information when you make a purchase, contact us, and respond to our communications to you. Demographic data may include data about:	<ul style="list-style-type: none"> <li>To provide, maintain, operate, personalize, and improve our Platform.</li> <li>To evaluate and improve the content of our Platform.</li> </ul>

Collection Type	Description	How We Use Information Collected
	<ul style="list-style-type: none"> <li>o Your business or company information;</li> <li>o Your professional reference contact information,</li> <li>o Social media URLs; and</li> <li>o Other data reflecting your preferences for our Platform.</li> </ul>	<ul style="list-style-type: none"> <li>■ To provide customer support.</li> <li>■ To monitor the usage of our Platform.</li> <li>■ To gather analysis and assess trends and interests.</li> </ul>
<b>Third-Party Data</b>	This may include both Personal Information and non-personally identifiable data from our partners, vendors, data brokers or public sources.	<ul style="list-style-type: none"> <li>■ To provide, maintain, operate, personalize, and improve our Platform.</li> <li>■ To monitor the usage of our Platform.</li> <li>■ To gather analysis and assess trends and interests.</li> <li>■ To work with our service providers who perform certain business functions or services on our behalf.</li> <li>■ To provide you with advertising content in which we think you will be interested. As part of this customization, we may observe your behaviors on the Platform or on other websites.</li> </ul>
<b>Location Information</b>	We may collect general location information if you use features on our Platform that provide location-based services.	<ul style="list-style-type: none"> <li>■ To provide you with location-based services.</li> <li>■ To monitor the usage of our Platform.</li> <li>■ To gather analysis and assess trends and interests.</li> <li>■ To customize the Platform to your preferences and location.</li> </ul>
<b>Anonymized Information</b>	We use anonymized and aggregated information that may be created or derived from your Personal Information or usage of our Platform for purposes that include data analysis, improving our Platform, advertising, and developing new features and functionality within our Platform.	<ul style="list-style-type: none"> <li>■ To provide, maintain, personalize, and improve our Platform.</li> <li>■ To monitor the usage of our Platform.</li> <li>■ To prevent or investigate fraud.</li> <li>■ To gather analysis and assess trends and interests.</li> <li>■ To conduct aggregate or research analysis to enhance, protect, and make informed decisions on our Platform.</li> </ul>

Collection Type	Description	How We Use Information Collected
		<ul style="list-style-type: none"> <li>■ To detect, prevent, and address technical issues.</li> <li>■ To enforce our agreements, terms, conditions, and policies.</li> <li>■ To help maintain the safety, security, and integrity of our Platform and technology assets.</li> </ul>
<b>Usage Information</b>	<p>This can be Personal Information and non-Personal Information that may be collected about you when you are using our Platform, and this may include:</p> <ul style="list-style-type: none"> <li>○ Information about your interactions with our Platform, which includes the date and time of any information you enter into our Platform and your interactions with other users of our Platform and what content or features you interacted with.</li> <li>○ Technical data which may include URL information, <b>cookie data, web beacons, web pixels</b>, clickstream information collection, and other tracking technology information, your IP address, the types of devices you are using to access or connect to our Platform, unique device IDs, device attributes, network connection type (e.g., WiFi, 3G, LTE, Bluetooth) and provider, network and device performance, browser type, language, and operating system. Further details about the technical data that is processed by us can be found below.</li> </ul> <p>Our Platform uses cookies, unique identifiers and similar technologies to collect information over time and across different websites when you use or visit our Platform. We or our third-party partners use common tracking tools to collect information about the pages you view, our Platform functions that you</p>	<ul style="list-style-type: none"> <li>■ To improve our content and the products, services, materials, and other content we make available through the Platform.</li> <li>■ To optimize the display of our Platform on your device. To create, maintain and personalize your account with us.</li> <li>■ To provide, maintain, personalize, and improve our Platform.</li> <li>■ To provide customer support.</li> <li>■ To monitor the usage of our Platform.</li> <li>■ To allow you to participate in interactive features of our Platform when you choose to do so.</li> <li>■ To gather analysis and assess trends and interests.</li> <li>■ To enforce our agreements, terms, conditions, and policies.</li> <li>■ To detect, prevent, and address technical issues.</li> <li>■ To prevent or investigate fraud.</li> <li>■ To provide you with advertising content in which we think you will be interested. As part of this customization, we may observe your behaviors on the Platform or on other websites.</li> <li>■ To help maintain the safety, security, and integrity of our Platform and technology assets.</li> <li>■ To investigate complaints and potential violations of our policies.</li> </ul>

Collection Type	Description	How We Use Information Collected
	<p>access, the buttons and icons you click, and to remember your login information and Platform settings to make it easier and more efficient for you to use our Platform, and to provide advertising content that we think may be of interest to you.</p> <p>We or our third-party partners may use invisible <a href="#">pixels or beacons</a> on our Platform to count how many users access or use certain pages, features or content.</p>	
	<p><a href="#">Cookies</a>. Cookies are small data files that are downloaded onto your computer or mobile device when you use our Platform, which are unique to your device or account. Cookies make it easier for you to use our Platform by saving your preferences so that we can use these to improve your next and subsequent visits to our Platform. Cookies help us learn which areas of our Platform are useful and which areas need improvement.</p> <p>You can choose whether to accept cookies by changing the settings on your browser or device. Each browser has its own methods for doing this. For detailed instructions on how to disable, block or delete cookies in your browser, consult your browser's help files or visit <a href="#">How to Manage Cookies</a>. Please bear in mind that if you choose to disable this function, your experience with our Platform may be impaired and some features may not work as they were intended. When we use cookies or other similar technologies, we may set the cookies ourselves or ask third parties to do so to help us.</p> <p>Please note that our Platform is not set up to respond to Do Not Track (DNT) signals, but it does respond to browser cookies settings. You may opt-out from receiving personalized advertising from some third parties by visiting <a href="#">here</a>. Please note that these choices will not opt you out of receiving advertisements. You will continue to receive generic advertisements. Like many websites, we use analytics, including Google Analytics. You may find out more about how Google Analytics collects and processes data by visiting “How Google uses data when you use our partners’ sites or apps” found <a href="#">here</a>. Further, you can elect to directly opt out of Google Analytics using your information by using the opt-out browser add-on, which you can learn about <a href="#">here</a>.</p>	
	<p><a href="#">Pixels, Web Beacons</a>. This information may be collected and reported in the aggregate. We may use this information to improve our current Platform offerings, develop new products or services, and target information to you that may be helpful and useful to you based upon your use of our Platform.</p>	

## 5. Sharing Your Information

We may share non-Personal Information with third parties at our discretion. In connection with our Platform, we may share your Personal Information with certain third parties who we may engage to help us run our business and perform the Platform, including under the following circumstances:

- a. Service providers that help us to administer and provide the Platform (for example, a web hosting company whose services we use to host our platform).
- b. Software and service providers we use to manage and process your information, for example, providers of payment processing software (e.g., payment processing software).
- c. Corporate affiliates, including corporate parents, subsidiaries, other affiliated entities and associated entities, and customers
- d. Google Analytics, a service provided by Google, Inc., to gather information about how you and other users engage with our Platform and to allow tracking technologies and remarketing services on the Platform through the use of first party cookies and third-party cookies, to, among other things, analyze and track users' use of the Platform, determine the popularity of certain content and better understand online activity. For more information about Google Analytics, please visit [www.google.com/policies/privacy/partners](http://www.google.com/policies/privacy/partners).
- e. Business partners, including promotional partners who are helping us run a joint promotion or who provide a product or service in partnership or collaboration with us in participating regions.
- f. Third parties in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings).
- g. Other third parties that you expressly request or authorize us to share your Personal Information with.

Additionally, we will share your Personal Information with third parties where required by law, where it is necessary in connection with our Platform or products, where it is necessary to respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities, where necessary to protect our rights, privacy, safety or property, and/or that of our affiliates, you, or others, where necessary to detect, prevent, or otherwise address fraud, security, or technical issues, or where we have another legitimate interest in doing so. BaseFund does not share Personal Information with public and government authorities absent a court order or other legally enforceable request.

BaseFund does not sell Personal Information to third parties. Furthermore, BaseFund will not use your name or the name of your company in any marketing statements without your permission.

Where required in order to complete a transaction with you or to facilitate any of the other services described in this Privacy Policy or within our [Terms of Use](#), most of the third parties with whom we may share your Personal Information are located and store your information in the United States, although some may be located or store your information outside of the United States.

## 6. ACKNOWLEDGEMENT

To the extent that you provide or transmit any information, including, but not limited to, any Personal Information and any information that identifies any other individual (including without limitation name, email address and/or telephone number), to BaseFund or our third-party service or data providers, licensors, or distributors (“Representatives”) through the Platform, you warrant that (a) you are providing or obtaining only your own information or the information of others which you are authorized to provide to third parties and/or obtain from



third parties on their behalf; and (b) the use of such information by BaseFund and its Representatives will not infringe upon or misappropriate the intellectual property rights or otherwise violate the rights of any third parties.

## **7. How We Safeguard Your Information**

The security of your data is important to us but remember that no method of transmission over the Internet or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Information, we cannot guarantee its absolute security. Any transmission of Personal Information is at your own risk. By using our Platform, you acknowledge and accept these risks. As a result, we cannot guarantee or warrant the security of any information you disclose or transmit to us or that are otherwise provided to us and we cannot be responsible for the theft, destruction, or inadvertent disclosure of information. It is your responsibility to safeguard any passwords, ID numbers, or other special access features associated with your use of the Platform. Any transmission of information is at your own risk.

## **8. Transfer of Data; Special Notice to Non-U.S. Users**

Your information, including Personal Information, may be transferred to – and maintained on – computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ from those of your jurisdiction. Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer. Services are provided solely to individuals located in the United States. By using the Services, you represent that you are located in the United States and you consent to the general use and disclosure of your Personal Information in the United States.

## **9. Policy on Children’s Information**

Our Platform is not created for anyone under the age of 13 (“Children” or “Child”). By using the Platform, you represent that you are at least 13 years old. If you do not meet this age requirement, then you must not access or use our Platform.

We do not knowingly collect personally identifiable information from anyone under the age of 14, and we do not target the Platform to Children. If you are a parent or guardian and you are aware that your Child has provided us with Personal Information, please contact us through one of the methods listed under “***How to Contact Us***” above. If we become aware that we have collected Personal Information from Children without verification of parental consent, we take reasonable steps to remove that information from our servers.

For more information about the Children’s Online Privacy Protection Act (“COPPA”), which applies to websites that direct their services to children under the age of thirteen (13), please visit the Federal Trade Commission’s website: <https://www.ftc.gov/tips-advice/business-center/guidance/complying-coppa-frequently-asked-questions>.

## **10. Links to Other Platforms**

Our Platform may contain links to third-party websites that are not operated or maintained by BaseFund. If you click on one of those links, you will be taken to websites we do not control. By providing a link to a third-party website, we are not endorsing or attempting to associate with any other entity, their content or services, or the persons or entities associated with those websites. This Privacy Policy does not apply to the information practices



of those third-party websites. You should read the privacy policies of third-party websites carefully. We are not responsible for the content, privacy policies, actions or security of third-party websites.

## **11. Governing Law and Jurisdiction**

This Privacy Policy shall be construed and governed under the laws of the United States and State of Delaware (without regard to rules governing conflicts of laws principles). You agree that exclusive venue for all actions, arising out of or relating in any way to your use of our Platform, shall be in a court of competent jurisdiction located in Wilmington, Delaware. Each party waives any objections based on forum non conveniens and waives any objection to venue of any action instituted hereunder to the extent that an action is brought in the courts identified above. Each party consents to personal jurisdiction in the courts identified above.