

# Privacy Policy

Sentivue Capital LLC

Effective Date: February 26, 2026 | Version 1.0

Sentivue Capital LLC ("Sentivue," "we," "us," or "our") is committed to protecting the privacy and security of personal information entrusted to us by our clients, prospective investors, website visitors, and business partners. This Privacy Policy describes how we collect, use, disclose, and safeguard your information when you visit our website (sentivuecapital.org), use our services, or otherwise interact with us.

By accessing our website or using our services, you acknowledge that you have read, understood, and agree to be bound by this Privacy Policy. If you do not agree with the terms of this policy, please do not access the site or use our services.

## 1. Information We Collect

### 1.1 Personal Information Provided Directly

We may collect personally identifiable information that you voluntarily provide when you:

- Submit an investor inquiry or contact form
- Apply for an investment account or partnership
- Subscribe to our newsletters, market reports, or research publications
- Communicate with us via email, telephone, or other channels
- Participate in due diligence or onboarding processes
- Engage with us at industry events or conferences

This information may include: full legal name, date of birth, postal and email addresses, telephone numbers, government-issued identification numbers, tax identification numbers, bank account and financial information, accredited investor status documentation, employment history, net worth and income information, and source of funds documentation.

### 1.2 Information Collected Automatically

When you access our website, we automatically collect certain technical information through cookies, web beacons, and similar tracking technologies, including:

- IP address, browser type and version, and operating system
- Device identifiers and hardware specifications
- Pages viewed, time spent, click patterns, and referring URLs
- Geographic location data (city/region level) derived from IP address
- Access times, dates, and frequency of visits

### 1.3 Information from Third Parties

We may receive information about you from third-party sources including identity verification services, credit reporting agencies, anti-money laundering (AML) databases, politically exposed persons (PEP) screening services, and publicly available data sources, including business registries and regulatory filings.

## 2. How We Use Your Information

We use the information we collect for the following purposes:

- **Account Administration:** To open, maintain, and service investor accounts; process subscriptions and redemptions; and provide account statements and reports.
- **Regulatory Compliance:** To comply with applicable laws, including Know Your Customer (KYC), Anti-Money Laundering (AML), Counter-Terrorism Financing (CTF), and tax reporting requirements such as FATCA and CRS.
- **Investment Operations:** To manage fund operations, execute trading strategies, calculate net asset values, and generate performance reports.
- **Communication:** To respond to your inquiries, provide market updates, send transactional notifications, and deliver investor communications.
- **Security and Fraud Prevention:** To protect against unauthorized access, detect fraudulent activity, and maintain the security and integrity of our systems.
- **Legal Obligations:** To enforce our terms, comply with legal processes, and respond to regulatory requests or subpoenas.
- **Business Development:** To evaluate potential business relationships, conduct due diligence, and improve our products and services.

## 3. Information Sharing and Disclosure

We do not sell, rent, or trade your personal information to third parties for marketing purposes. We may share your information in the following circumstances:

- **Service Providers:** With trusted third-party vendors who assist us in operating our business, including fund administrators, prime brokers, custodians, auditors, legal counsel, IT service providers, and compliance consultants, subject to confidentiality obligations.
- **Regulatory Authorities:** With financial regulators, tax authorities, and law enforcement agencies as required by applicable law or regulation.
- **Professional Advisors:** With our attorneys, accountants, and other professional advisors in connection with legal, tax, or business advisory matters.
- **Business Transfers:** In connection with a merger, acquisition, reorganization, or sale of assets, your information may be transferred as part of such transaction, subject to confidentiality protections.
- **Consent:** With your explicit consent or at your direction.

## 4. Data Security

We implement industry-standard administrative, technical, and physical safeguards designed to protect your personal information from unauthorized access, disclosure, alteration, and destruction. These measures include:

- 256-bit AES encryption for data at rest and TLS 1.3 for data in transit
- Multi-factor authentication for all account access and administrative systems
- Role-based access controls with principle of least privilege
- Regular penetration testing, vulnerability assessments, and security audits
- Employee security awareness training and background checks
- Physical security controls at all office locations and data centers
- Incident response plan with documented breach notification procedures

While we strive to protect your information, no method of electronic storage or transmission is 100% secure. We cannot guarantee absolute security of your data.

## 5. Data Retention

We retain personal information for as long as necessary to fulfil the purposes for which it was collected, comply with legal and regulatory obligations, resolve disputes, and enforce our agreements. Investor account records are retained for a minimum of seven (7) years following termination of the account relationship or as otherwise required by applicable law. When personal information is no longer required, we securely delete or anonymize it in accordance with our data retention schedule.

## 6. Your Rights and Choices

Depending on your jurisdiction, you may have the following rights regarding your personal information:

- **Right of Access:** Request a copy of the personal information we hold about you.
- **Right of Rectification:** Request correction of inaccurate or incomplete personal information.
- **Right of Erasure:** Request deletion of your personal information, subject to legal retention requirements.
- **Right to Restrict Processing:** Request limitation of processing of your personal information in certain circumstances.
- **Right to Data Portability:** Request transfer of your personal information in a structured, commonly used, machine-readable format.
- **Right to Object:** Object to processing of your personal information for direct marketing purposes.
- **Right to Withdraw Consent:** Where processing is based on consent, you may withdraw consent at any time without affecting the lawfulness of prior processing.

To exercise any of these rights, please contact us at [IR@sentivuecapital.org](mailto:IR@sentivuecapital.org). We will respond to your request within thirty (30) days or as required by applicable law.

## 7. Cookies and Tracking Technologies

Our website uses cookies and similar tracking technologies to enhance your browsing experience, analyze website traffic, and understand usage patterns. You may control cookies through your browser settings. Please note that disabling cookies may limit certain functionality of our website. We use the following categories of cookies:

- **Strictly Necessary:** Essential for website operation and security.
- **Analytics:** Help us understand how visitors interact with our website.

- **Functional:** Enable enhanced functionality and personalization.

We do not use advertising or behavioral tracking cookies.

## 8. International Data Transfers

Your personal information may be transferred to and processed in countries other than your country of residence. Where such transfers occur, we ensure appropriate safeguards are in place, including standard contractual clauses approved by applicable regulatory authorities, or other legally recognized transfer mechanisms.

## 9. Children's Privacy

Our services are not directed to individuals under the age of 18. We do not knowingly collect personal information from minors. If we become aware that we have collected information from a minor, we will take steps to delete such information promptly.

## 10. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, technology, legal requirements, or other factors. We will notify you of any material changes by posting the updated policy on our website with a revised effective date. We encourage you to review this policy periodically.

## 11. Contact Information

If you have questions, concerns, or requests regarding this Privacy Policy or our data practices, please contact us:

<b>Investor Relations:</b>	IR@sentivuecapital.org
<b>Owner:</b>	Jason Byers
<b>Website:</b>	sentivuecapital.org