

MG FINANCIAL LLC – Privacy Policy

This Privacy Policy (the “Privacy Policy”) sets forth the privacy policies of MG Financial LLC (“MG Financial”, the “Company”, “we”, or “us”) and describes the type of information that the Company gathers from visitors to <https://www.mgfinancial.com/> (the “Site”) and certain clients and investors (collectively, the “Services”).

By using the Services (including, but not limited to, the Site), you signify your acceptance of this Privacy Policy. If you do not agree to this Privacy Policy, do not use the Services.

Collection, Use, and Sharing of Personal Information

“Personal Information” means information that can be associated with a particular user. The chart below details what Personal Information we collect.

What Personal Information We Collect	How We Collect the Personal Information	Why We Collect the Personal Information
Information concerning current, prospective and past clients and investors (each, an “ <u>Investor</u> ” and, collectively, the “ <u>Investors</u> ”) which may include, but is not limited to, an Investor’s name, address, social security number, government-issued identification, tax identification number, net worth, total assets, income, account balance, investment history and other financial information (collectively, “ <u>Investor Information</u> ”).	We collect this from several sources, including the contractual agreements with Investors and related documents, correspondence, and discussion between the Investor and Company representatives, and transactions with the Company.	We use this to determine required accreditation and qualification standards as well as financial sophistication, and to process Investors’ requests, communicate with Investors, provide Investors, with other services and updates, as well as to administer the Site and comply with applicable laws.
Information used to create a user profile, including name, location, phone number, and email address.	Users input this information directly when creating user profiles.	We use this information to create user profiles and communicate with users.
Information you provide as part of communicating with us, including email address.	We receive this information when a user emails us.	We use this information to communicate with users.

We do not share this information, except as explained below under “Third-Party Contractors,” “Business Transitions,” and “Compliance with Law and Prevention of Harm.”

Third-Party Contractors – We may use contractors (“Service Providers”) to perform limited services on our behalf, such as website hosting platforms, email service providers, attorneys, auditors, and administrators. Service Providers are required to maintain the confidentiality of Personal Information and/or Investor Information, and not to use Personal Information and/or Investor Information for any purpose other than the service they were hired to perform.

Business Transitions and Affiliates – We may share information with businesses that are legally part of the same group as, or that are affiliated entities of, the Company, or that become part of that group. We reserve the right – in the event of a business transition such as a merger – to transfer Personal Information and/or Investor Information to a new business owner, on the condition that such Personal Information and/or Investor Information must be treated in accordance with this Privacy Policy.

Compliance with Law and Prevention of Harm – We may disclose your Personal Information, Investor Information, or any information submitted via the Services if we have a good faith belief that disclosure of such information is helpful or reasonably necessary to: (i) comply with any applicable law, regulation, legal process or governmental request; (ii) enforce any applicable terms of service, including investigations of potential violations thereof; (iii) detect, prevent, or otherwise address fraud or security issues; or (iv) protect against harm to the rights, property or safety of the Company, our users, yourself or the public. We may be required to disclose Personal Information and/or Investor Information in response to a lawful request by public authorities, including to meet national security or law enforcement requirements. We will also disclose Investor Information if the Investor directs us to do so, in connection with any government or self-regulatory organization request or investigation, or as otherwise required by law. If you redeem your investment, the Company may continue to share your Personal Information and/or Investor Information as described in this Privacy Policy.

Third Party Content – If and to the extent that the Services include embedded content (e.g., videos, podcasts, images, articles, etc.) that are linked from other websites, such embedded content will be subject to the privacy policies of such websites, rather than this Privacy Policy.

No Sale of Personal Information – We do not sell Personal Information.

Use, Sharing, and/or Sale of Non-personal Information – We may aggregate data on user behavior with respect to the Services or de-identify Investor Information such that the Investor Information can no longer be associated with an individual Investor. This data does not enable identification of individual users and is not Personal Information and/or Investor Information as defined by this Privacy Policy. As such, our use, sharing, and/or sale of non-personal information is not restricted by this Privacy Policy.

User Choices with Respect to Personal Information

Users of the Services may request information about our collection, use, and disclosure of their information (a “Request to Know”), including:

- the categories and specific pieces of Personal Information we have collected about the user;

- the categories of sources from which we have collected the user’s Personal Information;
- the business or commercial purpose for collecting or selling the user’s Personal Information;
- the categories of Personal Information we have sold about the user; and
- the categories of Third Parties with whom we have shared, disclosed for a business purpose, or sold the user’s Personal Information, and which categories of Personal Information we have sold to which categories of Third Parties.

Users may also request (i) that we delete their Personal Information (a “Request to Delete”) (ii) to opt-out of the sharing of personal information; (iii) that we correct inaccurate personal information collected from them; (iv) to limit the use and disclosure of sensitive Personal Information collected from them.

Requests to Know

Users may submit a Request to Know by emailing us at teammg@mgfinancial.com or by calling us toll free at (833) 888-7377.

Users may submit two types of Requests to Know: (1) A request for the specific pieces of Personal Information that we have collected about you in the past twelve (12) months; or (2) a request for the categories of Personal Information that we have collected about you in the past twelve (12) months, and we have used and disclosed that Personal Information.

When you submit a Request to Know, we may ask you to provide certain pieces of information in order to verify your identity, such as your name, email address, and phone number. If you submit a Request to Know for the specific pieces of information that we have collected about you, we may also require you to submit a signed declaration under the penalty of perjury stating that you are the consumer whose Personal Information is the subject of the Request to Know.

If we are able to verify your identity, we will respond to your Request to Know by: (a) providing the requested information; or (b) explaining why we are not required to provide the requested information. If we are unable to verify your identity, we will respond by explaining why we cannot verify your identity. We will confirm receipt of your Request to Know within ten (10) days and will respond to your Request to Know within forty-five (45) days. If a response requires additional time, we will notify you of the basis for the delay and may extend our response period up to an additional forty-five (45) days.

If we provide the information requested, we will provide the information free of charge and in a readily useable portable format. We have no obligation to provide Personal Information to you more than twice in a twelve (12)-month period. If a Request to Know or series of Requests to Know are manifestly unfounded or excessive, we may charge a reasonable fee for processing the Request(s) to Know, or may refuse to process the Request(s) to Know.

Requests to Delete

Users may submit a Request to Delete by emailing us at teammg@mgfinancial.com or by calling us toll free at (833) 888-7377. When you submit a Request to Delete, we may ask you to provide certain pieces of information in order to verify your identity, such as your name, email address, and phone number. If we are able to verify your identity, we will respond to your Request to Delete by (a) deleting your Personal Information and, if applicable, directing any of our Service Providers to delete your Personal Information; or (b) explaining why we are not required to delete your Personal Information. We may choose to delete Personal Information by de-identifying, aggregating, or completely erasing the Personal Information. We will specify the manner in which we delete your Personal Information.

If a Request to Delete or series of Requests to Delete are manifestly unfounded or excessive, we may charge a reasonable fee for processing the Request(s) to Delete, or may refuse to process the Request(s) to Delete.

Additional Rights and Information for Users Residing in the European Union and Switzerland.

For users outside of the United States, we transfer data from outside countries – including the European Union and Switzerland – to data centers located in the United States for processing.

European Union and Switzerland

Our processing of Personal Information and Investor Information is intended to be performed in accordance with privacy rights and regulations following the EU Directive 95/46/EC of the European Parliament and of the Council of 24 October 1995 (the “Directive”), and the implementations of the Directive in local legislation. From May 25, 2018 onward, the Directive and local legislation based on the Directive was replaced by the Regulations (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016 on the protection of natural persons with regard to the processing of Personal Information and on the free movement of such data, known as the General Data Protection Regulation (“GDPR”). With respect to direct communications with EU residents, we provide the rights required by the GDPR and rely upon such residents’ consent and our legitimate interests in doing business with such residents. With respect to information we may receive from third-parties regarding an EU resident, we rely upon contractual provisions that are in accordance with the GDPR.

If you are a resident of the European Union or Switzerland, you may have several rights under the GDPR and/or applicable local data privacy laws regarding Personal Information:

- You have the right to request an accounting of all Personal Information that we possess that pertains to you in an electronically portable format (e.g., electronic copies of information attached to an email).
- You have the right to request that we change any Personal Information that pertains to you.
- You have the right to request that we delete or rectify (to the extent that any data is found to be inaccurate) any Personal Information that pertains to you.

- You have the right to data portability (access to data in a structured, commonly used and machine-readable format, and (if possible) transmission directly to another data controller).

To request an accounting of your Personal Information, a change to your Personal Information, or deletion of your Personal Information, contact teammg@mgfinancial.com.

If you have a complaint about our use or processing of your Personal Information, you have the right to lodge a complaint with a national Data Protection Authority. Each European Union member nation has established its own Data Protection Authority; you can find out about the Data Protection Authority in your country here: https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm. Contact information for the Federal Data Protection and Information Commissioner (FDPIC) can be found here: <https://www.edoeb.admin.ch/edoeb/en/home/deredoeb/kontakt.html>.

Protection and Retention of Personal Information

We follow generally accepted industry standards, including the use of appropriate administrative, physical and technical safeguards, to protect Personal Information and Investor Information. The appropriate administrative, physical, and technical safeguards employed by us may vary depending on the nature of Personal Information or Investor Information collected, with more stringent measures applied to information of a sensitive nature.

However, no method of transmission over the Internet, or method of electronic storage, is entirely secure. Therefore, while we strive to use commercially reasonable means to protect Personal Information and Investor Information, we cannot guarantee its absolute security or confidentiality. Please be aware that certain Personal Information, Investor Information, and other information provided by you in connection with your use of the Services may be stored on your device (even if that information is not collected by us). You are solely responsible for maintaining the security of your device from unauthorized access.

Personal Information and Investor Information will be retained for as long as is reasonably necessary to achieve the purposes set forth in this Privacy Policy, and to comply with all applicable laws.

Other Provisions

Accessibility and Language – Any person that is unable to access this Privacy Policy through the Services may request this Privacy Policy in an alternative format or language by contacting us through the “Contact” page on the Site or by email at teammg@mgfinancial.com.

International Users – The Company and its servers are located in the United States and are subject to applicable local, state, and federal laws. Users who choose to access the Services do so on their own initiative and at their own risk, and are responsible for complying with all applicable laws, rules and regulations. Users who choose to access the Services consent to the use and disclosure of information in accordance with this Privacy Policy and subject to such laws. We may limit the availability of the Services (including, but not limited to, the Site), in whole or in part, to any person, geographic area or jurisdiction we choose, at any time and in our sole discretion. We do

not represent or warrant that the Services, or any part thereof (including, but not limited to, the Site), is appropriate or available for use in any other jurisdiction.

Children’s Privacy – The Services are neither directed to nor structured to attract users under the age of eighteen (18). If you are under the age of 18, you are not permitted to use the Services. The Company does not knowingly collect Personal Information from users under the age of eighteen (18). If you are a parent with concerns about children’s privacy issues in conjunction with the use of the Services, please contact us through the “Contact” page on the Site or by email at teammg@mgfinancial.com.

Do Not Track Signals and Collection of Information for Third-Party Advertising – The Company is required to disclose how it responds to “Do Not Track Signals” and whether third parties collect personally identifiable information about users when they use online services. The Company does not honor “do not track” signals.

Amendments – We may modify or amend this Privacy Policy from time to time. If we make any material changes, as determined by us, to this Privacy Policy, including in the way in which Personal Information or Investor Information is collected, used or transferred, we will post a notice of modification on the Site, which will be effective immediately upon our posting.

Contact Information

If you have questions about this Privacy Policy, please contact teammg@mgfinancial.com.

Effective Date

The effective date of this Privacy Policy is February 8, 2024.