

PRIVACY POLICY

At Triumph Advisor LLP (the “Company”), your privacy is very important to us. We also value transparency and want to be clear about how we collect, use and share information about you.

This policy is here to help you understand:

- The categories of information we collect about you
- How we use information we collect
- How we share information we collect
- How we store and secure information we collect
- Other important privacy information

This Privacy Policy applies to you when you access or use any domains or subdomains Triumph Advisor LLP a website at <https://triumphadvisorsllp.com/> (the “Site”), download and/or use Triumph Advisor LLP application (the “Application”), or when you access, use, or download any other products, services, features, content, widgets, materials or other tools offered by the Company or its subsidiaries and affiliates, including Triumph Advisor LLP and Triumph Advisor LLP (collectively the “Services”). “Triumph Advisor LLP”, “we”, “us”, and “our” refer to the Company together with any of our subsidiaries and corporate affiliates.

WHAT INFORMATION WE COLLECT ABOUT YOU

We collect the categories of personal information listed below:

- Directly from you when you provide the information to us,
- Indirectly from you when you use or access our Services, the Site, or the Application, and
- From other sources like third-party service providers and partners.

Information you provide to us

We collect information from you when you input it or otherwise provide it directly to us.

Account Information: We collect information about you when you create an account or sign up for Services. For example, you provide your name, email address, password, and phone number when you create an account. You also select whether you are signing up as an investor or a shareholder. Depending on the Services you select, you provide your address, date of birth, and taxpayer ID, such as a PAN or other government issued ID number. We collect this information to verify your identity as required by Indian law. If you register or use the Services through third-party sites or applications, such as Google, we may gather information from them.

Bank, Brokerage and Other Payment Information: To transact with us, you provide your banking information, including bank account, to permit you to send funds to us or receive funds from us. You may also provide us with other payment information when you elect to send funds to us using alternative payment methods.

Buyer Information: To make investments with us, when you create an account or sign up for Services, you provide us information concerning whether you are investing on your own behalf or that of an institution, your investment objectives, risk tolerance, investment time-horizon, investment experience, and information concerning your income and/or net worth. You also provide certain commercial information and information about your investment preferences, which become a part of your investor profile, and may include how much you anticipate investing in certain asset classes, your target investment size per investment, the asset classes you have invested in, and sectors of interest.

For investments related to some issuers, you may also provide us employment information or representations that you are not affiliated with, or employed by, a competitor of that issuer. If you express interest in investing

in a particular investment opportunity, you provide us with information about your interest and preferences which may include the investment amount and other information regarding your interest in making an investment.

Seller Information: To sell private company equity with us, you provide us with information and documents concerning your ownership of shares or options. For example, you provide information about the company in which you own the shares, ownership type, and the number of shares you want to sell. If you are a seller, you also provide us with information and documents reflecting your vesting and other attributes applicable to your shares or options. You may also be asked to provide your spouse's name and email address if you are married. You also provide information about your preferences, such as, for example, the price at which you desire to sell your shares.

Support Information and Other Communications: The Services include customer support, where you may choose to submit information or questions concerning a problem you are experiencing with a Service or questions you have about a Service. You may also provide, or be asked to provide, screenshots, documentation or information to help us address your problem or respond to your question.

You may also provide us with feedback and survey responses when using the Service, as well as other information you voluntarily provide to us when communicating with us, such as via email, any chat bots available on the Site and/or the Application, or via other actions you perform when using the Services. You may also provide us with your marketing and email preferences in your account settings.

Trust Information: If you purchase or sell securities held in the name of the trust, you provide us with additional information and documents concerning the identity and contact information of individuals related to the trust.

Verification Information and Documents: If required to help us verify your identity, you may provide us a copy of your driver's license, passport or other government issued ID. If required to help us verify your residence, you may provide us with a utility bill, lease or other proof of residence. You may also provide us other verification documents, such as bank statements reflecting the source of funds. By providing the verification information and documents mentioned above, you also provide us information within those records, which may include characteristics of protected classifications like your sex, age, national origin, and citizenship status.

Voluntary Information: If you authorize your accountant, financial advisor, lawyer or relative to receive information about our Services on your behalf, or to take actions on the Site on your behalf, you provide us the name and contact information for the person you authorize. If you are a selling shareholder and have a preferred representative at your current or former company with whom you'd like us to communicate, you provide us the name and contact information of that preferred representative.

Transaction Information: We collect information in connection with the transactions you become a party to through our Services as either a seller or a buyer ("Transaction Data"). Transaction Data includes, without limitation, the terms on which you purchase or sell securities and information relating to price, size, volume, class of securities, bids, offers, transfer restrictions, and any derivative data related thereto.

Information we collect when you use the Services

We collect the following categories of information about you when you use our services, including when visiting the Site or the Application, and taking certain actions within the Services.

Information About Your Use of the Services: We collect certain information about you when you visit the Site and interact with any of our Services. We collect information about when you use Services, the pages within the Site and/or the Application you visit, the links you click on, the type, size and names of files you upload or download, and the search terms you use. If you invite others to use the Site or Application, we retain information about your referral.

Device and Connection Information: We collect information about your computer, phone, tablet or other device you use to access the Services. This device information may include your operating system, browser type, IP address, URLs of referring pages, App name and version, and device identifiers.

Cookies, Web Beacons, Pixel Tags and Other Similar Technologies: Triumph Advisor LLP and its third-party service providers, such as our analytics and advertising partners, collect certain information using cookies, web beacons, pixel tags and other similar technologies to provide functionality, enable and support security features, recognize you across different devices, improve our offerings, understand how you use and interact with our Services, improve performance of Services, and otherwise manage and enhance Services. “Cookies” are simple text files stored on your device for use by a browser. “Web Beacons” or “pixel tags” are small images, often transparent, on a website or email that are used to observe if you have accessed content. Using cookies, web beacons or pixel tags, or other tracking technologies are standard practices on internet web sites.

Some web browsers transmit “do-not-track” signals to websites. Currently, our Services are not designed to respond to these signals or similar mechanisms from browsers.

We use session cookies to make it easier for you to use our Services and to identify you while you are on the Site or Application. We also use persistent cookies to make it easier for you to navigate the Site and track whether you are logged into the Site. A persistent cookie remains on your device’s hard drive for an extended time. You can remove persistent cookies by following the directions provided in your internet browser’s “help” file. If you reject persistent cookies, you will still be able to view the Site, but your ability to use some areas of the Site, such as automatically generated recommendations, will be limited.

Information we receive from other sources

We receive information about you from third-party services and business partners.

Third-Party Identity Verification Service Provider: We receive information about you from a third-party identity verification service provider to help us confirm your identity, prevent fraud, money laundering and other illegal activity, and to satisfy legal requirements relating to the Services.

Marketing and Advertising Services and Partners: We receive information about you and your activities on and off the Services from third-party service providers, such as Google, mix panel, Hot Jar, LinkedIn and other advertising, social media and market research partners who provide us with information about you, and/or your engagement with and interest in our Services.

Business Partners: We may receive information about you from our third-party partners, under referral programs, partnership agreements and/or under joint marketing arrangements.

HOW WE USE INFORMATION WE COLLECT

We use the information we collect based on the Services you choose to receive. The specific purposes are described below.

To Provide the Services and Personalize Your Experience: We use information about you to provide the Services to you, including to process transactions for you, authenticate you when you log in, verify your identity, and, if you are seeking to invest, determine your eligibility for investments. We also use information you provide to validate that information, comply with legal requirements, provide customer support and communicate with you, and operate and maintain the Services. For example, we use the banking information you provide to send you funds when they are due to you, from selling securities on the Site or when proceeds are due to you from investments made through the Site.

We also use information about you to personalize and improve your experience while using the Services and to determine the effectiveness of the Services. We also use information about you and your activities to provide an integrated experience, such as allowing you to access the Services from multiple devices.

To Communicate With You About the Services: We use your contact information to send communications to you (typically via email) about your transactions, including confirming the terms on which you purchase or sell securities, updating you on the status of transactions and related deadlines, responding to your questions or comments, and providing information received from the issuer or, when applicable, other parties to your transactions. If you are eligible to invest through the Site, we send you notifications about potential investment opportunities available through the Site. We also provide tailored communications to you based on actions you take on the Site. For example, if you start the investment process on the Site, we will use your contact information to remind you to come back and complete the investment process. We also send you communications about the Services as part of onboarding to help you understand and use the Services.

If you download and/or use the Application, and if you are a registered user of the Application, we may send push notifications to your device as a way to deliver information, offers, alerts, updates, reminders, news, and other relevant notifications pertaining to Services, including messages, sounds, and hyperlinks to pages within the Application, or hyperlinks to pages on the Site. Push notifications may be controlled from within the Application's settings and at the device's operating system "OS" level at any time. For additional information about push notifications, please see our Terms of Use.

To Operate the Services: We share information about you as needed with our own service providers, including financial institutions, fund administrators, accountants, auditors, lawyers, payment providers, information technology staff, advisors and our affiliates. We only share information to the extent it is required to fulfill our obligations to you and to regulators, and to operate the Site and the Services.

For Research and Development: We strive to make our Services better, smarter, faster, more secure and easier to use. We collect information about how people use the Services and feedback provided directly to us to identify trends and problems, usage and activity patterns, and areas for integrating and improving our Services. We may also test and analyze certain new features with some users before rolling out the features to all users.

To Market, Promote and Drive Engagement with the Services: We use your contact information and information about how you use the Services to send promotional communications that may be of interest to you, including by email and by displaying our content on other websites and applications, such as on platforms including Google or Facebook. These communications are intended to increase engagement and what you get out of the Services, including information about new features, new content, and events we think may be of interest to you. We also communicate with you about new products and services and promotions.

We do not – and do not plan to – rent or sell personally identifiable information about you to other people or to non-affiliated companies.

For Safety and Security: We use information about you and your Service to verify your identity, accounts and activity, to monitor suspicious or fraudulent activity, and to identify violations of Service policies. We also use your information to debug, identify and fix errors that impair how our Services function.

As Required by Law or Regulations: We retain information about you that is required by law or regulation, including those applicable to the sale of securities. In general, we are required to retain these records for at least three years, and up to six years (and in some circumstances, longer). We may keep some information longer to meet our needs and those of our customers, even after you close or deactivate your account, including for backup, archives, contract enforcement, dispute resolution. We may access and disclose information about you with US, state or international regulators where we believe doing so is required or appropriate to comply with laws, regulations or other legal processes or law enforcement requests, such as court orders or subpoenas.

For a Merger, Sale or Other Asset Transfer: If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, creation of a trust or other affiliated entity, receivership or sale of Triumph Advisor LLP assets, or other corporate transaction affecting Infinity Investments, your information

may be shared, transferred or sold under a duty of confidentiality as part of a transaction as permitted by law or by contract.

If you have consented to our use of information about you for a specific purpose, you may change your mind at any time, but this will not affect any processing that has already taken place. Where we are using your information because we or a third party (e.g., your employer) have a legitimate interest in doing so, you may object to that use though, in some cases, this may mean no longer using the Services.

HOW WE SHARE INFORMATION WE COLLECT

We manage a private company equity marketplace, and we want it to work well for you. This means sharing information through the Services and with certain third parties. We share information we collect about you with third parties in the ways discussed below, including in connection with possible business transfers.

With Affiliates of Infinity Investments: If you are a party to a prospective or actual transaction, we share information about you with our affiliates to provide you Services relating to that transaction.

With Parties to a Transaction, Companies and Service Providers: If you are a party to a prospective or actual transaction, we will give the other party (or other parties) to the transaction the information they need to evaluate and enter that transaction. If you enter a transaction with a third-party company, such as by becoming a shareholder, that company will receive information about you subject to its own privacy policy and may be required to disclose that information to its own board members, officers, investors or shareholders.

We also provide your information where necessary for a transaction or to comply with legal requirements. For example, we may provide certain aspects of your information to financial institutions, payment processors, fund administrators, accountants, auditors, lawyers, payment providers, third-party hosting service, email and technology service providers, information technology staff, advisors, affiliates, marketing and analytics partners, or third-party verification services.

As part of providing their services to us, our marketing and advertising service providers mentioned above may use cookies and other technologies to collect data on our users' behavior and their devices. This may include, for example, a device's IP address, device type (unique device identifiers), browser information, and geographic location (region and/or country only).

We do not and will not sell your personally identifiable information. We also do not offer financial incentives, preferential service agreements, or any other differences in our prices or services in exchange for your data.

We may share aggregated, deidentified and/or anonymized information that does not specifically identify you or any individual user of our Services for any purpose with any third parties, including but not limited with advertisers, national industry organizations, and prospective affiliates, or as permitted or required by law, or to protect our rights.

With Regulators: We may share information about you with regulators where we believe doing so is required or appropriate to comply with any laws, regulations or other legal processes or law enforcement requests, such as court orders or subpoenas.

We may also share information about you to protect the security and integrity of our Services, to protect ~~Third Party~~ interests, or those of other persons or the public.

With Business Partners: We may share information about you with our third-party partners under referral programs, partnership agreements or under joint marketing arrangements.

With Third-Party Sites: The Site may contain links to third party web sites and may redirect you to third party web sites ("Third Party Sites"). These sites include, among others, service providers who have a relationship with the Company. Third Party Sites are not under our control, and we are not responsible for any Third-Party Sites, or the accuracy, sufficiency, correctness, reliability, veracity, completeness, or timeliness of their information, links, changes or updates. The inclusion or access to Third Party Sites does not imply an endorsement thereof by the Company, or of the provider of such content or services, or of any third-party web site. The Company reserves the right to terminate any link or linking program at any time. Please be aware that when you enter a third-party web site, any information you provide, including financial information, is subject to the terms of use and privacy policy of that site.

With Your Consent: We share information about you where you have given us consent to do so for a specific purpose. For example, we may disclose information to your financial advisor, accountant attorney or spouse, or other individual or company you authorize to receive information about you.

Business Transfers: We may share or transfer information we collect under this privacy policy in connection with any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company. You will be notified via email and/or a prominent notice on the Services if a transaction takes place, as well as any choices you may have regarding your information.

HOW WE STORE AND SECURE INFORMATION WE COLLECT

We are taking steps to ensure that your information is treated securely and in accordance with this policy. While we use industry-accepted security principles, practices, and tools, the internet is not 100% secure and we cannot ensure or guarantee the security of data, during transmission through the Internet or while stored on our systems or otherwise in our care. We do not accept liability for unintentional disclosure.

By using the Service or providing personal data to us, you agree that we may communicate with you electronically regarding security, privacy, and administrative issues relating to your use of the Service. If we learn of a security breach, we may attempt to notify you electronically by posting a notice on the Service or sending an email to you. You may have a legal right to receive this notice in writing.

We request third party service providers to agree to keep your information confidential by entering into agreements that limit their use of the information they receive about you for the purpose of performing the services for which they are being retained.

Access to Your Data and Documents: You may review, correct or update the personal data you provide at any time. You may access your documents relating to your transactions at any time by logging in into your account and navigating to the "My Documents" and the "My Transactions" section of the Site or Application. If you need assistance, please contact us at Info@triumphadvisorsllp.com.

Unsubscribe Options: If you choose to use the Services, you will receive periodic emails or other electronic communications from us which, based on the information you provide, may be of interest. If you no longer wish to receive our communications, you may unsubscribe by following the instructions included in each communication.

Children's Privacy: The Site and our Services are not directed to any person under the age of 18. If you become aware that your child has provided us with personal data without your consent, please contact us as Info@triumphadvisorsllp.com. We do not knowingly collect or solicit information from, market to, or accept services from children.

Lost or Stolen Information: You must promptly notify us if you become aware that any information provided by or submitted to the Site is lost, stolen or used without permission.

Changes to this Policy: Each time you visit the Site or use the Services, the current version of the Policy will apply. When you use the Site, you should check the date of this Policy (which appears at the top of the Policy) and review any changes since the last version. Our business changes frequently and this Policy is subject to

change from time to time. Unless stated otherwise, our current Policy applies to all information that we have about you. We may require you to affirmatively assent to a revised version of this Policy as a condition of continuing to use the Site or our Services.

Submitting Requests Pertaining to Your Information: If you would like to make a request regarding your information, you may do so, free of charge, by reaching out at Info@triumphadvisorsllp.com

Please note that for all requests, we will need to verify your identity to confirm that you are the individual about whom we have collected personal information.

Contact Us: Your information is controlled by Triumph Advisor LLP Inc. If you have any questions or concerns about how your information is handled, you may contact us at:

Infinity Investments

Info@triumphadvisorsllp.com