

PRIVACY POLICY

Revised Date: March 30th, 2024

This privacy notice for Grow Share Capital ('we', 'us', or 'our'), describes how and why we might collect, store, use, and/or share ('process') your information when you use our services ('Services'), such as when you visit our main website, member's area or any website of ours that links to this privacy notice.

If you do not agree with our policies and practices, please do not use our Services.

SUMMARY OF KEY POINTS

This summary provides key points from our privacy notice, but you can find out more details about any of these topics under each heading listed in the table of contents.

Personal Information - When you visit, use, or navigate our Services, we may process personal information depending on how you interact with us and the Services, the choices you make, and the products and features you use. Learn more about personal information you disclose to us.

Information from third parties - We do not receive any information from third parties.

Processing your information - We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent. We process your information only when we have a valid legal reason to do so. We may process sensitive personal information when necessary with your consent or as otherwise permitted by applicable law.

Sharing personal information - We may share information in specific situations and with specific third parties. For example; charitable organisations when we donate on behalf of our members or government agencies in order to benefit our members. Information shared will be kept to the minimum amount required.

Keeping your information safe - We have organisational and technical processes and procedures in place to protect your personal information. However, no electronic transmission over the internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorised third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information.

Your rights - Depending on where you are located geographically, the applicable privacy law may mean you have certain rights regarding your personal information.

Exercising your rights - The easiest way to exercise your rights is by contacting us. We will consider and act upon any request in accordance with applicable data protection laws.

Want to learn more about what we do with any information we collect? Review the privacy notice in full.

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WHAT INFORMATION DO WE COLLECT?

While using our service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you. The personal information that we collect depends on the context of your interactions with us and the Services, the choices you make, and the products and features you use. The personal information we collect may include, but may not be limited to, the following:

- First and Last Name
- Phone Number
- Email Address
- Address, Postal Code, City
- Bank Account Information

When necessary, with your consent or as otherwise permitted by applicable law, we process the following categories of sensitive information:

- Financial Data

All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information.

We automatically collect certain information when you visit, use, or navigate the Services. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Services, and other technical information. This information is primarily needed to maintain the security and operation of our Services, and for our internal analytics and reporting purposes.

We use cookies and similar tracking technologies to track the activity on our Service and hold certain information. Cookies are files with a small amount of data which may include an

anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyse our Service. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

The information we collect includes, but may not be limited to:

Log and Usage Data - Log and usage data is service-related, diagnostic, usage, and performance information our servers automatically collect when you access or use our Services and which we record in log files. Depending on how you interact with us, this log data may include your IP address, device information, browser type, and settings and information about your activity in the Services (such as the date/time stamps associated with your usage, pages and files viewed, searches, and other actions you take such as which features you use), device event information (such as system activity, error reports (sometimes called 'crash dumps'), and hardware settings).

HOW DO WE PROCESS YOUR INFORMATION?

We process your personal information for a variety of reasons, depending on how you interact with our Services, including:

- To facilitate account creation and authentication and otherwise manage user accounts. We may process your information so you can create and log in to your account, as well as keep your account in working order.
- To deliver and facilitate delivery of services to the user. We may process your information to provide you with the requested service.
- To respond to user inquiries/offer support to users. We may process your information to respond to your inquiries and solve any potential issues you might have with the requested service.
- To save or protect an individual's vital interest. We may process your information when necessary to save or protect an individual's vital interest, such as to prevent harm.

WHAT LEGAL BASES DO WE RELY ON TO PROCESS YOUR INFORMATION?

The General Data Protection Regulation (GDPR) and UK GDPR require us to explain the valid legal bases we rely on in order to process your personal information. As such, we may rely on the following legal bases to process your personal information:

Consent - We may process your information if you have given us permission (i.e. consent) to use your personal information for a specific purpose. You can withdraw your consent at any time. Learn more about withdrawing your consent.

Performance of a Contract - We may process your personal information when we believe it is necessary to fulfil our contractual obligations to you, including providing our Services or at your request prior to entering into a contract with you.

Legal Obligations - We may process your information where we believe it is necessary for compliance with our legal obligations, such as to cooperate with a law enforcement body or regulatory agency, exercise or defend our legal rights, or disclose your information as evidence in litigation in which we are involved.

Vital Interests - We may process your information where we believe it is necessary to protect your vital interests or the vital interests of a third party, such as situations involving potential threats to the safety of any person.

WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?

We may need to share your personal information in the following situations:

Business Transfers - We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.

Affiliates - We may share your information with our affiliates, in which case we will require those affiliates to honour this privacy notice. Affiliates include our parent company and any subsidiaries, joint venture partners, or other companies that we control or that are under common control with us.

Business Partners - We may share your information with our business partners to offer you certain products, services, or promotions.

DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information.

HOW LONG DO WE KEEP YOUR INFORMATION?

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice, unless a longer retention period is required or permitted by law (such as tax, accounting, finance, or other legal requirements).

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

HOW DO WE KEEP YOUR INFORMATION SAFE?

We have implemented appropriate and reasonable technical and organisational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorised third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the Services within a secure environment.

DO WE COLLECT INFORMATION FROM MINORS?

We do not knowingly solicit data from or market to children under 18 years of age. By using the Services, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Services. If we learn that personal information from users less than 18 years of age has been collected, we will

deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we may have collected from children under age 18, please contact us at info@growsharecapital.com

WHAT ARE YOUR PRIVACY RIGHTS?

In some regions (like the EEA and the UK), you have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; (iv) if applicable, to data portability; and (v) not to be subject to automated decision-making. In certain circumstances, you may also have the right to object to the processing of your personal information. You can make such a request by contacting us by using the contact details provided in the section 'HOW CAN YOU CONTACT US ABOUT THIS NOTICE?' below.

We will consider and act upon any request in accordance with applicable data protection laws.

If you are located in the EEA or UK and you believe we are unlawfully processing your personal information, you also have the right to complain to your Member State data protection authority or UK data protection authority.

Withdrawing your consent: If we are relying on your consent to process your personal information, you have the right to withdraw your consent at any time. You can withdraw your consent at any time by contacting us by using the contact details provided in the section 'HOW CAN YOU CONTACT US ABOUT THIS NOTICE?' below or updating your preferences.

However, please note that this will not affect the lawfulness of the processing before its withdrawal nor will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

If you would at any time like to review or change the information in your account you can log in to your account settings and update your user account information.

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases in accordance with the Partnership Agreement (signed by each active club member). However, we may retain some information in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our legal terms and/or comply with applicable legal requirements.

Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our Services.

If you have questions or comments about your privacy rights, you may email us at info@growsharecapital.com

CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ('DNT') feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage no uniform technology standard for recognising and implementing DNT signals has been finalised. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy notice.

DO WE MAKE UPDATES TO THIS NOTICE?

We may update this privacy notice from time to time. The updated version will be indicated by an updated 'Revised' date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information.

HOW CAN YOU CONTACT US ABOUT THIS NOTICE?

If you have questions or comments about this notice please contact Grow Share Capital, by email at info@growsharecapital.com and include reference to the privacy policy in the subject.