

CALIFORNIA CONSUMER PRIVACY NOTICE

Last updated: November 2025

INTRODUCTION

Your privacy is very important to us.

This California Consumer Privacy Notice contains disclosures required by the California Consumer Privacy Act (“CCPA”) as amended by the California Privacy Rights Act (“CPRA”) and only applies to California residents. This California Consumer Privacy Notice applies to the collection or other use of “personal information” that is subject to the CCPA and does not apply to certain personal information, such as information subject to the Gramm-Leach-Bliley Act 1999 (Reg S-P) or the Fair Credit Reporting Act.

References to “you” or “your,” in this California Consumer Privacy Notice mean any resident of California.

PERSONAL INFORMATION WE COLLECT

In the past 12 months, we may have collected, without limitation, the following categories of personal information about you:

- i Identifiers, such as your real name, alias, email address, postal address, Internet Protocol (IP) address, account name, Social Security number, driver’s license number, passport number, or other similar personal identifiers;
- ii Other personal information categories (as listed in the California Customer Records statute), such as your signature, physical characteristics or description, telephone number, insurance policy number, education, employment, employment history, bank account number or any other financial information, medical information, or health insurance information;
- iii Protected classification characteristics under California or federal law, such as your age, race, citizenship, marital status, gender, or veteran or military status;
- iv Commercial information, such as your account activity, records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies;
- v Biometric information, such as your fingerprints, faceprints, voiceprints, and iris or retina scans;
- vi Internet or other similar network activity, such as information regarding your interaction with our website, online portal, or other applications;
- vii Sensory data, such as recordings of your audio (e.g., voicemails);
- viii Professional or employment-related information, such as your current or past job history or performance evaluations;
- ix Non-public education information, such as your education records maintained by an educational institution or party acting on its behalf;
- x Inferences drawn from other personal information, such as a profile reflecting your preferences, characteristics, trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes; and
- xi Sensitive Personal Information, such as your Social Security number, driver’s license number, state identification card number, or passport number; account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account; and racial or ethnic origin.

We do not knowingly sell personal information from anyone under the age of 18 without the prior consent of a parent or guardian.

SOURCES OF PERSONAL INFORMATION WE COLLECT

We primarily collect personal information from the following categories of sources:

- i. Your communications with us;
- ii. Service providers, including, but not limited to, administrators, lenders, banks, trading counterparties, auditors, law firms, consultants, placement agents, employment agencies and recruiters, and background check providers;
- iii. Affiliates not under the LibreMax Capital, LLC brand;
- iv. Nonprofit organizations; and
- v. Government entities.

USE OF PERSONAL INFORMATION

We may use the personal information we collect for one or more of the following purposes:

- i. Providing you with information about our products and services;
- ii. Providing performance and other updates;
- iii. One or more of the following business purposes:
 - o Performing services (for us or our service provider) such as account servicing, processing orders and payments, and analytics;
 - o Auditing related to our interactions with you (e.g., counting ad impressions to unique visitors, verifying positioning/quality of ad impressions, and auditing compliance, etc.);
 - o Legal compliance;
 - o Internal operations;
 - o Activities to maintain and improve our services; and
 - o Other commercial purposes, including, but not limited to, activities that are directed to advancing commercial or economic interests, such as inducing a person to buy, rent, lease, join, subscribe to, provide or exchange products or services, or enabling or effecting a commercial transaction.

DISCLOSING PERSONAL INFORMATION

We may disclose your personal information as follows:

Identifiers	• Service Providers • Affiliates • Business Partners
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Other personal information categories (as listed in the California Customer Records statute)	• Service Providers • Affiliates • Business Partners
Protected classification characteristics under California or federal law	• Service Providers • Affiliates • Business Partners
Commercial information	• Service Providers • Affiliates • Business Partners
Biometric information	• Service Providers • Affiliates • Business Partners
Internet or other similar network activity	• Service Providers • Affiliates • Business Partners
Sensory data	• Service Providers • Affiliates • Business Partners
Professional or employment-related information	• Service Providers • Affiliates • Business Partners
Non-public education information	• Service Providers • Affiliates • Business Partners

Inferences drawn from other personal information	• Service Providers • Affiliates • Business Partners
Sensitive Personal Information	• Service Providers • Affiliates • Business Partners

Please note, our Service Providers, include but are not limited to, administrators, lenders, banks, trading counterparties, auditors, law firms, consultants, placement agents, employment agencies and recruiters, and background search and financial sanctions risk management providers.

We may disclose your personal information to comply with our legal obligations (in response to a subpoena or other legal process by a governmental entity or third party if otherwise required by law) and internal policies. We may also share your personal information, on an as needed basis, to facilitate a business transfer or merger.

In the past 12 months, we have not sold any personal information we collect to third parties, and we have shared personal information for cross-context behavioral purposes.

We do not use Sensitive Personal Information for any additional purposes that are incompatible with the purposes listed above, unless we provide you with notice of those additional purposes.

RIGHTS OF CALIFORNIA CONSUMERS

Subject to certain exceptions and limitations, you have the following rights under your California law:

- i. The right to request: (a) the categories and specific pieces of personal information we collect, use, disclose, and sell about you; (b) the categories of sources from which we collected your personal information; (c) our business purposes for collecting or selling your personal information; and (d) the categories of personal information disclosed for a business purpose, sold, or shared with third parties (for cross-context behavioral advertising) and the categories of persons to whom it was disclosed, sold, or shared (and with respect to personal information that is sold or shared, organized by category or categories of personal information for each category of third parties to whom the personal information was sold or shared)
- ii. For certain categories of personal information, the right to request a list of what personal information (if any) we disclosed to third parties for their own direct marketing purposes in the past 12 months and the names and addresses of those third parties;
- iii. The right to request that we delete the personal information we have collected from you or maintain about you, subject to certain exception;
- iv. The right to correct inaccurate personal information we may maintain about you;
- v. The right to limit our use of your sensitive personal information to only use that is necessary to perform the services expected or provide the goods reasonably expected;

- vi. The right to opt out of our sale(s) (if any) of your personal information; and
- vii. The right not to receive discriminatory treatment for the exercise of the privacy rights conferred by the CCPA.

You may submit requests to exercise your rights under the CCPA to our General Counsel at legal@libremax.com or at [\(212\) 612-1550](tel:2126121550).

We may need to request additional information from you to verify your identity or understand the scope of your request. In verifying requests, we will require you to provide, at a minimum your mailing address and telephone number to verify your identity. If we are unable to verify your identity, we will need to deny your request.

You may designate an authorized agent to make a CCPA request on your behalf. In such case, we will ask the agent to provide proof that you have given the agent signed permission to act on your behalf. In addition, we will ask you to either (i) verify your identity directly with us in the manner described above; or (ii) directly confirm with us that you have provided the agent permission to make the request on your behalf.

RETENTION OF PERSONAL INFORMATION

We retain personal information for as long as necessary to provide the services and fulfill the transactions you have requested, or for other business purposes such as complying with our legal obligations, resolving disputes, and enforcing our agreements. We decide how long we need personal information on a case-by-case basis. We may consider the following factors when making retention decisions:

- i. Whether we need to keep some of your personal information to maintain your account;
- ii. Whether we are required by law to keep some types of personal information for certain periods of time to comply with our legal obligations; and
- iii. Whether we need some of your personal information for other business purposes, such as to prevent harm and ensure safety and security of our website and services; investigate possible violations of our terms of Service; or otherwise protect ourselves.