

# Privacy Policy

**Effective Date:** June 10, 2025

## 1. Introduction

**Excellion Finance Management, LLC** ("Company," "we," "us," or "our") is committed to protecting your privacy. This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you visit our website <https://excellion.finance/> (the "Site"). Please read this Privacy Policy carefully.

## 2. Information We Collect

We may collect information about you in a variety of ways. The information we may collect on the Site includes:

- **Personal Data:** Personally identifiable information, such as your name, email address, and telephone number, that you voluntarily give to us when you contact us through the Site.
- **Derivative Data:** Information our servers automatically collect when you access the Site, such as your IP address, your browser type, your operating system, your access times, and the pages you have viewed directly before and after accessing the Site.
- **Data from Cookies:** We may use cookies, web beacons, tracking pixels, and other tracking technologies on the Site to help customize the Site and improve your experience.

## 3. How We Use Your Information

Having accurate information about you permits us to provide you with a smooth, efficient, and customized experience. Specifically, we may use information collected about you via the Site to:

- Respond to your inquiries and provide you with requested information.
- Operate and maintain the security of our Site.
- Perform our contractual obligations to our investors, including providing reports and other communications.
- Comply with our legal and regulatory obligations, such as those related to anti-money laundering (AML) and know-your-customer (KYC) requirements.

- For prospective investors, to assess your eligibility and suitability to invest in our funds under applicable securities laws.

#### **4. Disclosure of Your Information**

We may share information we have collected about you in certain situations. Your information may be disclosed as follows:

- **By Law or to Protect Rights:** If we believe the release of information about you is necessary to respond to legal process, to investigate or remedy potential violations of our policies, or to protect the rights, property, and safety of others.
- **Third-Party Service Providers:** We may share your information with third parties that perform services for us or on our behalf, including data analysis, hosting services, and fund administration (e.g., our Fund Administrator, Custodian, and Auditors).
- **Affiliates:** We may share your information with our affiliates, in which case we will require those affiliates to honor this Privacy Policy. 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.

#### **5. Your Data Protection Rights**

Depending on your location (e.g., California or the European Economic Area), you may have the following rights regarding your personal data:

- **The right to access** – You have the right to request copies of your personal data.
- **The right to rectification** – You have the right to request that we correct any information you believe is inaccurate or complete information you believe is incomplete.
- **The right to erasure** – You have the right to request that we erase your personal data, under certain conditions.
- **The right to object to processing** – You have the right to object to our processing of your personal data, under certain conditions.
- **The right to data portability** – You have the right to request that we transfer the data that we have collected to another organization, or directly to you, under certain conditions.

To exercise these rights, please contact us using the contact information provided below.

## **6. Specific Information for California Residents (CCPA/CPRA)**

If you are a California resident, you have the right to know what personal information we have collected about you, the right to delete your personal information, and the right to opt-out of the "sale" or "sharing" of your personal information. We do not "sell" your personal information as that term is traditionally understood. To exercise your rights, please contact us.

## **7. Data Security**

We use administrative, technical, and physical security measures to help protect your personal information. While we have taken reasonable steps to secure the personal information you provide to us, please be aware that despite our efforts, no security measures are perfect or impenetrable, and no method of data transmission can be guaranteed against any interception or other type of misuse.

## **8. International Data Transfers**

Your information may be transferred to, and maintained on, computers located outside of your state, province, country, or other governmental jurisdiction where the data protection laws may differ from those in your jurisdiction. If you are located outside the United States and choose to provide information to us, please note that we transfer the data, including Personal Data, to the United States and process it there.

## **9. Changes to This Privacy Policy**

We may update this Privacy Policy from time to time. The updated version will be indicated by an updated "Effective Date" and the updated version will be effective as of that date.

## **10. Contact Us**

If you have questions or comments about this Privacy Policy, please contact us at:

Excellion Finance Management, LLC

131 Continental Drive, Suite 301, Newark, New Castle, Delaware, USA, Zip Code 19713

[privacy@excellion.finance](mailto:privacy@excellion.finance)