

ASAL INVEST LLC

PRIVACY POLICY

Effective Date: August 2026

Asal Invest LLC ("Asal Invest," "we," "our," or "us") respects your privacy and is committed to protecting the personal information entrusted to us. This Privacy Policy describes how we collect, use, disclose, store, and protect information when you visit our website, use our mobile application, open an account, or otherwise interact with our services.

By accessing or using our services, you acknowledge that you have read and understood this Privacy Policy.

1. INFORMATION WE COLLECT

We collect information necessary to provide investment advisory services, facilitate brokerage account onboarding, comply with legal obligations, maintain security, and improve our services.

Information you provide may include:

- Full name
- Email address
- Phone number
- Residential address
- Date of birth
- Citizenship information
- Tax residency information
- Government-issued identification information
- Brokerage onboarding information
- Communications with customer support
- Any other information voluntarily provided by you

2. BROKERAGE AND REGULATORY INFORMATION

To facilitate brokerage account opening and ongoing account maintenance, we may collect and process information required by securities laws, anti-money laundering regulations, know-your-customer requirements, tax reporting obligations, and related regulatory requirements.

This information may include:

- Address
- Date of birth
- Citizenship status
- Tax residency status

- Account eligibility information
- Brokerage account status
- KYC verification status
- Regulatory onboarding information

3 INFORMATION COLLECTED AUTOMATICALLY

When you access our website or application, certain information may be collected automatically, including:

- Device type
- Operating system
- Browser information
- IP address
- Application performance information
- Crash reports
- Diagnostic information
- Usage and interaction data

This information is used to maintain security, improve performance, troubleshoot issues, and enhance the user experience.

4 HOW WE USE YOUR INFORMATION

We use personal information for purposes including:

- Providing investment advisory services
- Facilitating brokerage account onboarding
- Verifying identity
- Complying with legal and regulatory obligations
- Preventing fraud and unauthorized activity
- Maintaining platform security
- Responding to customer support requests
- Communicating with users
- Improving platform functionality
- Conducting internal analytics
- Enforcing agreements and policies

5 SERVICE PROVIDERS AND THIRD-PARTY PARTNERS

We engage trusted third-party providers to support our operations.

MongoDB

We use MongoDB to store and manage customer account information, including:

- Customer profile information
- Authentication information

- Account verification status
- Password security information
- Account creation and update records

Passwords are stored using industry-standard cryptographic hashing methods and are not stored in plain text.

Alpaca Securities LLC

Brokerage services are provided by Alpaca Securities LLC, Member FINRA/SIPC.

To facilitate account opening, brokerage services, custody, clearing, execution, and regulatory compliance, information may be shared with Alpaca Securities LLC, including:

- Identity information
- Contact information
- Address information
- Date of birth
- Citizenship information
- Tax residency information
- Brokerage account information
- KYC and onboarding information

Render Services

We utilize Render infrastructure services to support certain application functionality.

Where identity verification documentation is required, documents such as passports, driver's licenses, or government-issued identification may be temporarily processed through secure infrastructure for submission to applicable verification providers.

Such documents are not retained longer than necessary to complete the onboarding and verification process and are removed after successful transmission and processing.

• INFORMATION SHARING

We do not sell personal information.

We may share information with:

- Brokerage partners
- Custodians
- Identity verification providers
- Anti-money laundering providers
- Cloud infrastructure providers
- Technology service providers
- Regulators and governmental authorities when required by law
- Professional advisers such as attorneys, auditors, or compliance consultants

Information is shared only to the extent reasonably necessary to provide services, comply with legal obligations, or protect legitimate business interests.

7. DATA RETENTION

We retain information only for as long as necessary to:

- Provide services
- Maintain accounts
- Comply with securities regulations
- Satisfy anti-money laundering requirements
- Fulfill tax reporting obligations
- Resolve disputes
- Enforce agreements
- Maintain legally required business records

Certain records may be retained after account closure where required by applicable law.

8. SECURITY

We employ administrative, technical, and physical safeguards designed to protect personal information from unauthorized access, disclosure, alteration, or destruction.

Despite our efforts, no method of transmission or storage can be guaranteed to be completely secure. Users acknowledge that they provide information at their own risk.

9. ACCOUNT CLOSURE AND DATA REQUESTS

Users may request account closure by contacting Asal Invest.

Certain information may be retained following account closure to satisfy legal, regulatory, compliance, tax, anti-money laundering, and recordkeeping obligations.

Where permitted by law, users may request:

- Access to personal information
- Correction of inaccurate information
- Deletion of eligible information
- Information regarding our privacy practices

10. CALIFORNIA PRIVACY RIGHTS

California residents may have additional rights under applicable California privacy laws, including the right to request information regarding categories of personal information collected, disclosed, or shared.

Asal Invest does not sell personal information.

^{11.} CHILDREN'S PRIVACY

Our services are not directed toward individuals under eighteen (18) years of age.

We do not knowingly collect personal information from children.

^{12.} INTERNATIONAL USERS

Our services are intended primarily for individuals located within the United States.

If you access our services from outside the United States, you acknowledge that information may be transferred to and processed within the United States.

^{13.} CHANGES TO THIS POLICY

We may update this Privacy Policy from time to time.

Material changes will be communicated through the website, application, email, or other appropriate means.

Continued use of the services following any update constitutes acceptance of the revised Privacy Policy.

^{14.} CONTACT INFORMATION

Asal Invest LLC

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Phone: (646) 288-3548

If you have questions regarding this Privacy Policy or our privacy practices, please contact us using the information above.