

Privacy Policy of Kingdom Capital Management, Inc.

Last Updated: January 1, 2026

Kingdom Capital Management, Inc. (“Kingdom Capital”, “we”, “us”, or “our”) takes your privacy and the security of your information very seriously. This Privacy Policy (“Policy”) applies to our website, www.kingdomcapitalm.com, and all of its sub-domains (the “Site”). If you have any questions regarding this Policy, please contact us at compliance@kingdomcapitalm.com.

Introduction

This Policy describes the types of information we gather from individuals visiting our Site and how we use, transfer, and secure such information. It does not govern data or information we receive from third parties and does not cover third-party products and services. By accessing the Site, you agree to be bound by this Policy. If you do not agree to the terms of this Policy, please do not use the Site. Each time you use the Site, the current version of this Policy will apply.

Types of Information We Collect

We may collect two types of information from users of our Site:

1. Personal Information: Information that you provide that can be used to identify you (such as your name, email address, etc.).
2. Aggregate Information: Information that cannot be used to identify you (such as frequency of visits to the Site, device type, browser type, etc.).

Personal Information Collected

We collect Personal Information that you voluntarily provide when using our Site. For example, you may provide us with your email address, first and last name, phone number, or other Personal Information through our Site, via email, through an online form, or other method of communication.

Your Communications With Us

We collect information when you communicate with us. For example, if you send us an email, we will collect your email address and the content of your email.

Information We May Automatically Collect

When you visit our Site, we may automatically receive and collect certain information from your device, including:

- Operating system, hardware, system version, Internet Protocol (IP) addresses, device ID, and device language.
- Country and general location, time zone, and language used.

- Specific actions taken on our Site, such as pages visited, search terms entered, and interactions.
- Time, frequency, connection type, and duration of your use of our Site.
- Interaction with email messages, including whether you opened or clicked on them.
- Identifiers associated with cookies or other technologies that uniquely identify your device or browser.
- Referrer website and the website you visit immediately after ours.

Although we strive to honor the privacy preferences of our visitors, we cannot respond to "Do Not Track" signals from your browser at this time.

Cookies and Analytics

Like most websites, our Site may use "cookies." Cookies are alphanumeric identifiers transferred to your computer's hard drive through your web browser to help us identify you when you visit our Site.

We may use cookies for various reasons, including:

- Analyzing web traffic.
- Identifying if you are signed in to the Site.
- Testing content on the Site.
- Storing your preferences.
- Recognizing your return visits.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can modify your browser settings to decline cookies if you prefer. This may prevent you from fully utilizing the Site.

We may use third-party analytics providers to analyze traffic to the Site.

Aggregate Information Collected

Aggregate Information does not identify you and may be collected automatically when you visit our Site, independent of any information you voluntarily enter. We may de-identify information that contains Personal Information so that only Aggregate Information remains, which we may collect, use, store, and transfer without restriction.

Collection of Personal Information by Third Parties

Some links on our Site may redirect you to third-party websites and services we do not operate. The privacy practices of these websites and services are governed by their own policies, which we

do not control. If you submit information to any such third party through our Site, please review that party's privacy policy.

We offer an investor portal via the Site (the “Investor Portal”) to access materials such as fund financial statements, investor capital account statements, and distribution notices. The Investor Portal is hosted by Nav Consulting (<https://portal.navconsulting.net/navportalcore/login>), and your use of the Investor Portal and any data submitted is governed by Nav Consulting's privacy policy.

How We Use Your Information

We collect information and Personal Information from you to:

- Provide, operate, improve, and maintain our Site.
- Provide you with technical support.
- Send updates, marketing communications, and other information about Kingdom Capital and our products and services.
- Send notices and alerts.
- Conduct research, analytics, and monitor trends and usage.
- Respond to your inquiries and verify your status in connection with exchanges.
- Enhance user experience and the safety and security of our business and websites.
- Comply with applicable laws, regulations, and legal requests.
- Enforce rights and contracts, including investigating potential violations.
- Detect and prevent fraud or security issues.

How We Share Your Personal Information with Third Parties

We may transfer Personal Information to third parties to provide the Site. This includes disclosing Personal Information to affiliates or third-party service providers. Examples include providing information technology services.

We may also disclose Personal Information under special circumstances, such as:

- To comply with legal requirements or legal processes.
- To investigate possible crimes, such as fraud.
- In connection with a sale, purchase, merger, or reorganization.
- To protect the rights, property, or safety of Kingdom Capital or others.
- As required or permitted by law.

Opt-Out

If you no longer wish to receive our newsletter and promotional communications, you may opt-out by following the instructions included in each communication.

Children and Privacy

Our Site is not intended for use by children, and we do not knowingly collect Personal Information from children under the age of 13. If we become aware that a child under 13 has provided Personal Information, we will remove that information from our files.

How We Protect Your Information

We take the security of your Personal Information seriously and have implemented administrative, physical, and technical safeguards to protect it. Despite our efforts, we cannot guarantee that unauthorized third parties will not access or misuse your Personal Information.

Any email or communication purporting to be from our Site asking for sensitive information should be treated as unauthorized and reported to compliance@kingdomcapitalm.com.

A Note to Users Outside of the United States

If you are a non-U.S. user of the Site, by visiting the Site and providing us with your Personal Information, you acknowledge and agree that your information may be processed in the country in which it was collected and in other countries, including the United States, where laws regarding Personal Information may be less stringent.

Changes to This Policy

This Policy is subject to change from time to time, and we reserve the right to amend it without prior notice. The current version of the Policy will apply each time you use our Site.

How To Contact Us

For questions or comments regarding this Policy or the information collection practices of this Site, please email us at compliance@kingdomcapitalm.com.