PRIVACY POLICY

Effective and Last Updated as of October [●], 2026

INTRODUCTION

40 Acres App Inc. (together with its subsidiaries and affiliates, including [40 Acres Funding Portal LLC, a funding portal registered with the U.S. Securities and Exchange Commission ("SEC") and a member of the Financial Industry Regulatory Authority ("FINRA")], "**40 Acres**," "**we**," "**our**," or "**us**") respects the privacy of your information. This Privacy Policy is designed to assist you in understanding how we collect, use, share, and safeguard your information.[1]

40 Acres operates an online platform through which companies and sponsors ("**Issuers**") offer securities, including securities represented by digital tokens recorded on a blockchain ("**Tokenized Securities**"), to the public in reliance on Regulation Crowdfunding ("**Regulation CF**"), Regulation D and Regulation A under the Securities Act of 1933, as amended, and through which individuals and entities ("**Investors**") can review and invest in those offerings. This Privacy Policy applies to all individuals who access our website located at [www.●.com] ("**Site**"), our mobile applications, and any of our other online services (collectively, "**Services**"), including visitors to the Site, registered users, Investors, and the officers, directors, owners and other representatives of Issuers.

This Privacy Policy is incorporated into, and should be read together with, our **TERMS OF USE**[2]. By accessing or using the Site or Services, you acknowledge that you have read and understood this Privacy Policy. If you do not agree with our practices, please do not use the Site or Services.

If you are an Investor or a customer of our [40 Acres Funding Portal LLC] affiliate, you may also receive a separate privacy notice required by federal financial privacy laws, including the Gramm-Leach-Bliley Act and the SEC's Regulation S-P (a "**Financial Privacy Notice**"). To the extent the Financial Privacy Notice provides you with greater rights or protections, the Financial Privacy Notice will control with respect to the information it covers.[3]

This Privacy Policy covers the following topics:

1. **PERSONAL DATA WE COLLECT**
2. **HOW WE USE YOUR PERSONAL DATA**
3. **HOW WE SHARE YOUR PERSONAL DATA**

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[1] **Note to Client**: Please confirm the legal entities that will operate the platform and their regulatory status (including the name of the 40 Acres entity that will register with the SEC as a funding portal and become a FINRA member for Regulation CF offerings). We have bracketed the affiliate names and descriptions throughout and will conform them once the structure is final.

[2] **Note to Client**: Hyperlink to the Terms of Use in all places where it says Terms of Use.

[3] **Note to Client**: A registered funding portal is subject to Regulation S-P (17 C.F.R. Part 248), which requires a separate initial and annual privacy notice to customers in a prescribed form, written policies and procedures to safeguard customer information, and, under the 2024 amendments to Regulation S-P, an incident response program that includes notifying affected individuals of certain data breaches. This online Privacy Policy does not replace that notice. We recommend preparing the Regulation S-P privacy notice using the SEC's model form and posting it alongside this Privacy Policy.

4. BLOCKCHAIN AND TOKENIZED SECURITIES
5. YOUR COMMUNICATION CHOICES
6. COOKIES AND OTHER TRACKING TECHNOLOGIES
7. "DO NOT TRACK" SIGNALS AND GLOBAL PRIVACY CONTROL
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1. PERSONAL DATA WE COLLECT

We collect personal data from you through your use of the Site and Services. Personal data is information that is linked or reasonably linkable to an identified or identifiable individual. The personal data we collect depends on how you interact with us and the Services. Because the Services involve offers and sales of securities, federal and state securities laws, anti-money laundering laws and other laws require us to collect certain personal data before you can invest or raise capital through the Services. We collect the following types of personal data:

Personal Data You Provide

Depending on how you interact with our Site and Services, we will collect the following personal data that you voluntarily provide to us for the following purposes:

- *Create an Account.* If you create an account, you will provide us with your name, email address, and username, and you will create a password for future login purposes. You may also choose to provide a profile photograph, your city and state of residence, your investment interests, and other optional profile information. If you register or log in through a third-party service (such as Google, Apple, Facebook or LinkedIn), we will receive the information you authorize that service to share with us.
- *Request a Demo or Contact Us.* If you request to book a demo or otherwise contact us, you will provide us with your name, email address, phone number, company name, and the content of your inquiry.
- *Invest in an Offering.* Before you invest, we (or our service providers) will collect information needed to verify your identity, determine your eligibility to invest, and process your investment, including:

- *Identity Information*, such as your full legal name, residential address, date of birth, citizenship and country of residence, Social Security number or other taxpayer identification number, and a copy of a government-issued photo identification;[4]
- *Investment Limit and Suitability Information*, such as your annual income, net worth, and the amount you have invested in other Regulation CF offerings during the preceding twelve months, which we are required to collect to confirm that your investment does not exceed the investment limits imposed by Regulation CF or Regulation A, as well as your responses to investor education materials and acknowledgments;
- *Accredited Investor Information*, such as your representations regarding accredited investor status and, for offerings under Rule 506(c) of Regulation D, documents used to verify that status, such as tax returns, IRS forms, bank and brokerage statements, credit reports, or written confirmations from a registered investment adviser, licensed attorney, or certified public accountant;
- *Payment Information*, such as bank account and routing numbers, debit or credit card information, and other payment details used to fund your investment (which are generally collected and processed by our third-party payment processors and escrow agents);
- *Digital Wallet Information*, such as the public blockchain address of any digital wallet you connect to, or that is created for you through, the Services to receive, hold or transfer Tokenized Securities; and
- *Entity Investor Information*, if you invest on behalf of a trust, corporation, limited liability company, partnership, retirement account or other entity, such as the entity's formation documents, taxpayer identification number, and identifying information about its beneficial owners, control persons and authorized signatories.

- *Raise Capital as an Issuer.* If you apply to list an offering, or if you are an officer, director, manager, promoter or beneficial owner of an Issuer, we will collect your name, contact information, title, business and employment history, ownership interest in the Issuer, and the identity information described above. We will also collect information needed to conduct background and "bad actor" checks required by Regulation CF, Regulation D and Regulation A, as well as other due diligence on the Issuer and its principals. Information that Issuers are required to disclose in their offering materials (such as the names, positions and business experience of officers and directors) will be made publicly available on the Site and filed with the SEC.
- *Communicate on the Platform.* If you post comments, questions or other content in an offering's communication channel, discussion forum, or other public areas of the Services, we will collect that content along with your username and, where required by law, information identifying whether you are associated with the Issuer or are compensated to promote the offering. Please be aware that content you post in public areas of the Services

[4]**Note to Client**: Please confirm whether you or your identity verification vendor will collect a "selfie" image, facial geometry or other biometric identifiers as part of identity verification. If so, additional notice and consent requirements may apply under state biometric privacy laws (including the Texas Capture or Use of Biometric Identifier Act and the Illinois Biometric Information Privacy Act), and we will add a separate biometric consent to the onboarding flow.

is available to other users and the public. Under applicable securities laws, we may be required to retain such content even if you later delete it.

- *Attend Events, Respond to Surveys, or Make Referrals.* If you register for an event or webinar, respond to a survey, participate in a promotion, or refer a friend, we will collect your name, email address, mailing address, and the information you provide in the registration form, survey or referral (including the name and contact information of the person you refer).
- *Customer Support.* If you contact customer support, including through live chat, email or telephone, we will collect the information you provide, records of our communications with you, and (with notice where required by law) recordings of calls.

Personal Data as You Navigate Our Site

We automatically collect certain personal data through your use of our Site and Services and our use of cookies and other tracking technologies, such as the following:

- *Usage Information*. For example, the pages on the Site you access, the offerings you view, the frequency of access, the referring website, and what you click on while on the Site.
- *Device Information.* For example, Internet Protocol (IP) address, hardware model, operating system, application version number, browser type, and unique device identifiers.
- *Mobile Device Information*. Aggregated information about whether the Site is accessed via a mobile device or tablet, the device type, and the carrier.
- *Location Information*. Location information from Site visitors on a city-regional basis, which we derive from your IP address and use, among other things, to determine whether offerings may lawfully be made available in your jurisdiction.

For more information on our cookie usage see our "**COOKIES AND OTHER TRACKING TECHNOLOGIES**" section below.

Blockchain Information

When Tokenized Securities are issued to you or transferred to or from your digital wallet, the transaction is recorded on a public blockchain. We collect and maintain records linking your account to your digital wallet address(es), token balances, and the transaction hashes, timestamps and other data associated with your Tokenized Securities. We may also review publicly available blockchain data relating to wallet addresses that interact with the Services, including through blockchain analytics providers, to comply with anti-money laundering and sanctions laws and to enforce transfer restrictions that apply to Tokenized Securities. See "**BLOCKCHAIN AND TOKENIZED SECURITIES**" below.

Personal Data We Collect About You from Other Sources

In some cases, we may receive personal data about you from other sources. This includes identity verification, anti-money laundering and sanctions screening providers; background check and "bad actor" screening providers; accredited investor verification services; credit reporting agencies; payment processors, banks and escrow agents; transfer agents and digital asset custodians; Issuers (for example, if an Issuer invites you to invest in its offering); blockchain analytics providers;

government entities and public databases; advertising networks; data brokers; operating systems and platforms; mailing list providers; social networks; and advertising and marketing partners.[5]

Sensitive Personal Data

Some of the personal data we collect, such as Social Security numbers, government identification numbers, financial account information, and citizenship information, is considered "sensitive" under certain privacy laws. We collect and use sensitive personal data only as necessary to provide the Services you request, to verify your identity and eligibility to invest, to comply with our legal and regulatory obligations, and to prevent fraud and protect the security of the Services. We do not use or disclose sensitive personal data to infer characteristics about you.

2. HOW WE USE YOUR PERSONAL DATA

In addition to the purposes stated above, we may use all the personal data we collect in accordance with applicable law such as to:

To Provide and Operate the Services

- Create, maintain and secure your account, and authenticate you when you log in;
- Display offerings, process your investment commitments, and communicate with you about your investments, including confirmations, offering updates, cancellations, material changes, closings, and Issuer reports;
- Transmit investment funds to and from escrow, and process refunds and distributions;
- Issue, record and deliver Tokenized Securities to your digital wallet, add your wallet address to the list of wallets eligible to hold a Tokenized Security (sometimes called a "whitelist"), and enforce transfer restrictions that apply to Tokenized Securities;
- Provide information to transfer agents so that they can maintain the official record of securities ownership, and to facilitate permitted resales or transfers of securities, including through any alternative trading system or other secondary market;
- Prepare and deliver tax documents (such as IRS Forms 1099 and Schedules K-1);
- Respond to your inquiries and provide customer support; and
- Maintain and improve our Site and Services, and develop new products, features and offerings.

To Comply with Legal and Regulatory Requirements

- Verify your identity and conduct customer identification, "know your customer," anti-money laundering and sanctions screening (including screening against the U.S. Department of the Treasury's Office of Foreign Assets Control lists);
- Confirm that your investments comply with the investment limits of Regulation CF and Regulation A, verify accredited investor status where required, and determine whether an offering may lawfully be made available to you;

[5]**Note to Client**: Do you receive personal data from any third-party sources? We provide examples highlighted here and we can revise this list as needed.

- Conduct background and "bad actor" checks on Issuers and their covered persons, and perform other due diligence required of intermediaries;
- Make and keep books and records, respond to examinations, inquiries and requests from the SEC, FINRA, state securities regulators and other governmental authorities, and file reports required by law; and
- Comply with applicable law, regulation, legal process, and enforceable governmental requests.

To Protect Us and Others

- Protect the security and integrity of our Site and Services;
- Investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, or violations of our **TERMS OF USE**, and to otherwise fulfill our legal obligations;
- Monitor compliance with and enforce this Privacy Policy and any applicable agreements and policies; and
- Defend our legal rights and the rights of others.

For Marketing and Analytics

- Send you newsletters, information about new offerings, events and features, and other marketing communications, subject to your right to opt out as described in "**YOUR COMMUNICATION CHOICES**" below;
- Personalize your experience, including by recommending offerings that may be of interest to you; and
- Analyze how users interact with the Site and Services, measure the effectiveness of our advertising, and compile statistics.

Other Purposes

- Fulfill any other purposes for which you provide it;
- For any purpose that is reasonably necessary to or compatible with the original purpose for which we collected the personal data as disclosed to you; and
- With your consent.

Aggregated and De-identified Data

We may aggregate or de-identify personal data so that it can no longer reasonably be linked to you, and we may use and disclose such aggregated or de-identified data for any lawful purpose, including to publish statistics about investment activity on the platform. We will maintain and use de-identified data in de-identified form and will not attempt to re-identify it, except as permitted by law.

3. How We Share Your Personal Data

We do not sell your personal data to third parties for monetary consideration, and we do not share your personal data with unaffiliated third parties for their own direct marketing purposes. We may share the personal data that we collect about you in the following ways:

- *With Our Affiliates.* With our parent, subsidiaries and affiliates, including [40 Acres Funding Portal LLC], for the purposes described in this Privacy Policy;
- *With Issuers.* If you invest in, or express interest in, an offering, we will share with the Issuer (and its agents) your name, contact information, investment amount, investor status, and other information the Issuer needs to accept your investment, maintain its securities records, comply with its legal obligations, and communicate with you as a securityholder. **Once an Issuer receives your personal data, the Issuer's own privacy practices govern its use of that information**, and we are not responsible for those practices;
- *With Offering Service Providers.* With escrow agents, banks, qualified third parties, payment processors, transfer agents, digital asset custodians, token issuance and smart contract platform providers, alternative trading systems and other secondary market venues, and identity verification, accredited investor verification, background check and sanctions screening providers, in each case to facilitate offerings and investments through the Services and to comply with law;
- *With Vendors.* With vendors who perform data or Site-related services on our behalf (e.g., email, hosting, maintenance, backup, analysis, customer support, etc.);
- *With Advertising Vendors.* With vendors to prepare, deploy and analyze advertising content;
- *With Professional Advisors.* With our attorneys, accountants, auditors, insurers and other professional advisors in the course of the professional services they provide to us;
- *On the Blockchain.* When Tokenized Securities are issued or transferred, your wallet address and associated transaction data will be recorded on a public blockchain and will be visible to anyone with access to that blockchain. We do not record your name or other directly identifying information on a public blockchain;
- *Publicly.* Content you post in public areas of the Services, and your username, will be visible to other users and the public;
- *With Regulators and Law Enforcement.* With the SEC, FINRA, state securities regulators, the Financial Crimes Enforcement Network, the Internal Revenue Service and other governmental and self-regulatory authorities, to the extent that we are required to do so by law or in connection with an examination, investigation or regulatory inquiry;
- In connection with any legal proceedings or prospective legal proceedings;
- To establish, exercise, or defend our or a third party's legal rights, including providing information to others for the purposes of fraud prevention;
- With any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal data where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal data;

- *In Business Transfers.* With any other person or entity as part of any business or asset sale, equity transaction, merger, acquisition, bankruptcy, liquidation, or similar proceeding, or in preparation for any of these events, and such person or entity may use your personal data for their own purposes, subject to applicable law;
- With any other person or entity where you consent to or direct the disclosure; and
- For any other purpose disclosed by us when you provide the personal data or for any other purpose we deem necessary, including to protect the health or safety of others.

4. BLOCKCHAIN AND TOKENIZED SECURITIES

Because Tokenized Securities are recorded on a blockchain, there are certain features of blockchain technology that affect your privacy and that you should understand before investing:[6]

- *Public and Permanent Records.* Blockchain transactions are generally public, permanent and cannot be altered or deleted by us or anyone else. Although we do not record your name or other directly identifying information on a blockchain, your wallet address and transaction history are visible to the public, and third parties may be able to link a wallet address to you by combining blockchain data with other information.
- *Limits on Your Privacy Rights.* Because of the immutable nature of blockchain records, we may be unable to delete, correct or restrict blockchain data in response to a request to exercise your privacy rights. We can, however, delete or update the personal data that we maintain off-chain, subject to our legal record retention obligations.
- *Third-Party Wallets.* If you use a self-hosted digital wallet or a wallet provided by a third party, your use of that wallet is subject to the provider's terms and privacy policy, and you are responsible for safeguarding your private keys and recovery phrases. **We will never ask you for your private keys or recovery phrase.**
- *Custodial Services.* [If you elect to have your Tokenized Securities held by a qualified custodian through the Services, we will share your personal data with that custodian as needed to open and maintain your custodial account.]

5. YOUR COMMUNICATION CHOICES

We may send you communications by email, text message, push notification, or through the Services.

- *Marketing Emails.* You may opt out of receiving marketing emails from us at any time by clicking the "unsubscribe" link in any marketing email or by contacting us as described in the "**HOW TO CONTACT US**" section below.
- *Text Messages.* If you consent to receive text messages from us, you may opt out at any time by replying "STOP" to any text message. Message and data rates may apply, and

[6] **Note to Client**: Please confirm whether the platform will offer custodial wallets, support only self-custodied wallets, or both, and identify the blockchain network(s) on which tokens will be issued. We will tailor this section accordingly.

message frequency varies. Your consent to receive marketing text messages is not a condition of using the Services or making an investment.[7]

- *Push Notifications.* You may turn off push notifications through the settings on your mobile device.

Even if you opt out of marketing communications, we will continue to send you transactional and account-related communications, such as investment confirmations, notices of material changes to an offering, investment cancellation or reconfirmation notices, security alerts, tax documents, and other communications we are required by law to deliver. You may also update your account information and certain privacy preferences at any time through your account settings.

6. COOKIES AND OTHER TRACKING TECHNOLOGIES

Like many other companies, we use cookies and other tracking technologies (such as pixels, web beacons, and software development kits) (collectively, "**Cookies**"). "Cookies" are small files of information that are stored by your web browser software on your computer hard drive, mobile or other devices (e.g., smartphones or tablets).

We use Cookies to:

- Keep you logged in, remember your settings, and enable core security and anti-fraud features;
- Estimate audience size and usage patterns;
- Understand and save your preferences for future visits, allowing us to customize the Site and Services to your individual needs;
- Advertise new content, offerings and services that relate to your interests;
- Keep track of advertisements and search engine results;
- Compile aggregate data about site traffic and site interactions to resolve issues and offer better site experiences and tools in the future; and
- Recognize when you return to the Site.

We set some Cookies ourselves and others are set by other entities. We use Cookies set by other entities to provide us with useful information to help us improve our Site and Services, to conduct advertising, and to analyze the effectiveness of advertising. For example, we use Cookies from Google, Facebook and other similar companies.

How You Can Opt Out of Cookies

Cookies can be blocked by changing your Internet browser settings to refuse all or some Cookies. If you choose to block all Cookies (including essential Cookies) you may not be able to access all or parts of the Site.

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[7] **Note to Client**: Please confirm whether you will send text messages. If so, your sign-up flow should obtain express written consent that satisfies the Telephone Consumer Protection Act before any marketing texts are sent, and the consent language should be consistent with this section.

You can find out more about Cookies and how to manage them by visiting www.AboutCookies.org or www.allaboutcookies.org.

You can opt out of Cookies set by specific entities by following the instructions found at these links:

- Google: https://adssettings.google.com
- Facebook: https://www.facebook.com/about/ads
- LinkedIn: https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out

You can understand which entities have currently enabled Cookies for your browser or mobile device and how to opt-out of some of those Cookies by accessing the Network Advertising Initiative's website (http://optout.networkadvertising.org) or the Digital Advertising Alliance's website (http://optout.aboutads.info). For more information on mobile specific opt-out choices, visit the Network Advertising Initiative's Mobile Choices website (http://www.networkadvertising.org/mobile-choices).

Please note that these opt-out mechanisms are specific to the device or browser on which they are exercised. Therefore, you will need to opt out on every browser and device that you use.

Other Types of Collecting Activities

The Site and Services may use Cookies and similar technologies third-party vendors provide to collect information on user behavior (e.g., screens and pages visited, buttons and links clicked, limited information entered, and user taps and mouse movements). This information enables us to monitor and improve the user experience. We configure these tools so that they do not record passwords, Social Security numbers, financial account numbers, or other sensitive personal data you enter.

7. "DO NOT TRACK" SIGNALS AND GLOBAL PRIVACY CONTROL

Some internet browsers incorporate a "Do Not Track" feature that signals to websites you visit that you do not want to have your online activity tracked. Given that there is not a uniform way that browsers communicate the "Do Not Track" signal, the Site does not currently interpret, respond to or alter its practices when it receives "Do Not Track" signals. [However, where required by applicable law, we treat a Global Privacy Control (GPC) signal sent by your browser as a valid request to opt out of the "sale" or "sharing" of your personal data for the browser or device from which the signal is sent.]

8. DATA RETENTION

We will retain your personal data for as long as necessary to fulfill the purposes for which we collect it and as set out in this Privacy Policy, and for the purpose of satisfying any legal, accounting, regulatory, or reporting requirements that apply to us. In determining the appropriate retention period, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure, the purposes for which we process it, and applicable legal requirements.

Because we facilitate securities offerings, federal securities laws, FINRA rules, and anti-money laundering laws require us to keep many records relating to Investors, Issuers, investments and communications for specified periods after an account is closed or a transaction is completed. [As a result, we generally retain records relating to your account, identity verification, and investments for at least seven (7) years after the closing of your account or the applicable transaction, or longer where required by law or where necessary to resolve disputes or enforce our agreements.][8] When we no longer need your personal data, we will delete, de-identify, or securely destroy it in accordance with our record retention policies. Blockchain data cannot be deleted, as described in "**BLOCKCHAIN AND TOKENIZED SECURITIES**" above.

9. SECURITY

We maintain commercially reasonable administrative, technical, and physical security measures designed to protect the personal data we collect and store from loss, misuse, destruction, or unauthorized access. These measures include, for example, encryption of sensitive data in transit and at rest, access controls that limit access to personal data to personnel and service providers who need it, multi-factor authentication, and monitoring of our systems. We also require our service providers to protect the personal data we share with them.

However, no security measure or modality of data transmission over the Internet is 100% secure. Although we strive to use commercially acceptable means to protect your personal data, we cannot guarantee absolute security. You are responsible for keeping your account password, multi-factor authentication credentials, and digital wallet private keys confidential, and for notifying us promptly if you believe your account has been compromised.

If we learn of a security incident that affects your personal data, we will notify you and the appropriate authorities as required by applicable law, including Regulation S-P where it applies.

10. INTERNATIONAL DATA TRANSFERS

40 Acres is based in the United States, and offerings on the platform are generally intended for persons located in the United States. We operate internationally and transfer information to the United States for the purposes described in this policy. The United States may have privacy and data protection laws that differ from, and are potentially less protective than, the laws of your country. Your Personal Data can be subject to access requests from governments, courts, or law enforcement in the United States according to the laws of the United States.

For any transfers of Personal Data from the European Economic Area, Switzerland or the United Kingdom that we make to other entities as described in this Privacy Policy, we use appropriate safeguards to ensure for the lawful processing and transfer of the Personal Data, including, when appropriate, the use of standard contractual clauses approved by the European Commission (and

[8] **Note to Client**: The record retention periods depend on the regulatory status of each platform entity. For example, funding portals must generally keep required records for five years (Regulation CF Rule 404), and Bank Secrecy Act records are generally kept for five years. Many platforms (including Republic) disclose a general retention period of at least seven years for securities records. Please confirm the retention schedule adopted in your written policies so that this section matches it.

the UK International Data Transfer Addendum or Swiss equivalents, as applicable). To obtain a copy of the safeguards, contact us at [insert contact method].

11. THIRD PARTY LINKS AND SOCIAL MEDIA FEATURES

The Site may contain links that will let you leave the Site and access another website, including websites operated by Issuers, wallet providers, custodians and other third parties. Linked websites are not under our control. We accept no responsibility or liability for these other websites, and we encourage you to review the privacy policy of every website you visit.

The Site may also include social media features, such as "share" or "like" buttons. These features may collect your IP address and the page you are visiting on the Site, and may set Cookies to enable the feature to function properly. Your interactions with these features are governed by the privacy policy of the company providing them.

12. CHILDREN'S PRIVACY

The Site and Services are not intended for children under eighteen (18) years of age, and you must be at least eighteen (18) years of age (or the age of majority in your jurisdiction, if older) to open an account or invest through the Services. We do not knowingly collect, use, or disclose personal data from children under eighteen (18). If you believe that a child under eighteen (18) has provided personal data to us, please contact us as described in the "**HOW TO CONTACT US**" section below, and we will take steps to delete that information and close the associated account, subject to our legal obligations.

13. YOUR U.S. STATE PRIVACY RIGHTS

Depending on your state of residence, you may have certain rights with respect to your personal data under applicable state privacy laws. These rights are subject to exceptions. For example, many state privacy laws do not apply to personal data that is collected, processed or disclosed under the Gramm-Leach-Bliley Act and its implementing regulations, including Regulation S-P, which covers much of the information we collect from Investors in connection with their investments. Subject to these exceptions, you may have the right to:

- *Know and Access.* Confirm whether we process your personal data, and request access to and a copy of the personal data we have collected about you, including (where required) the categories of personal data, sources, purposes, and recipients;
- *Correct.* Request that we correct inaccurate personal data;
- *Delete.* Request that we delete personal data we have collected from you, subject to our legal record retention obligations and the limits described in "**BLOCKCHAIN AND TOKENIZED SECURITIES**" above;
- *Portability.* Receive the personal data you provided to us in a portable and, to the extent technically feasible, readily usable format;
- *Opt Out.* Opt out of the "sale" of your personal data, the processing of your personal data for targeted advertising (or "sharing" for cross-context behavioral advertising), and profiling in furtherance of decisions that produce legal or similarly significant effects; and

- *Appeal.* Appeal our decision with respect to your request by contacting us as described below with the subject line "Privacy Request Appeal." If we deny your appeal, you may contact your state attorney general.

We will not discriminate against you for exercising any of your privacy rights.

How to Submit a Request

To exercise any of these rights, please contact us at [insert email address] or [insert toll-free number], or through [your account settings / our online request form]. We will need to verify your identity before we can respond to your request, which may require you to log in to your account or provide information that matches information we already maintain about you. You may designate an authorized agent to submit a request on your behalf, but we may require written proof of the agent's authority and may require you to verify your identity directly with us. We will respond to verified requests within the time required by applicable law, generally within forty-five (45) days, which may be extended where permitted by law.

Notice to California Residents

This section supplements the rest of this Privacy Policy and applies to California residents under the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 ("**CCPA**"), to the extent the CCPA applies to us.[9]

Categories of Personal Information. In the preceding twelve (12) months, we have collected the following categories of personal information, which we obtain from the sources described in "**PERSONAL DATA WE COLLECT**" above and use for the business and commercial purposes described in "**HOW WE USE YOUR PERSONAL DATA**" above:

Category	Examples	Categories of Recipients
Identifiers	Name, postal address, email address, phone number, username, IP address, device identifiers, digital wallet address, Social Security number, government identification number	Affiliates; Issuers; offering service providers; vendors; professional advisors; regulators and law enforcement
Customer records (Cal. Civ. Code § 1798.80(e))	Name, signature, address, telephone number, financial account information, bank account number, employment information	Affiliates; Issuers; offering service providers; vendors; professional advisors; regulators and law enforcement
Protected classification characteristics	Age and date of birth, citizenship	Affiliates; Issuers; offering service providers; vendors; regulators

[9]**Note to Client**: The California Consumer Privacy Act applies only to for-profit businesses that meet certain thresholds (e.g., annual gross revenues above the statutory threshold, which is adjusted periodically, or buying, selling or sharing the personal information of 100,000 or more California consumers or households). Personal information collected under the Gramm-Leach-Bliley Act and its implementing regulations (including Regulation S-P) is also exempt from most CCPA requirements. Please let us know if you would like us to evaluate whether 40 Acres currently meets the CCPA thresholds. We recommend keeping this section in the policy in any event given expected growth and investor expectations.

Category	Examples	Categories of Recipients
Commercial information	Investment history, investment amounts, Tokenized Securities held, offerings viewed	Affiliates; Issuers; offering service providers; vendors; regulators
Internet or other electronic network activity	Browsing history, interactions with the Site, advertisements and emails	Affiliates; vendors; [advertising vendors]
Geolocation data	City and region derived from IP address	Affiliates; vendors
Professional or employment information	Employer, title, business experience (for Issuer principals); occupation (for Investors)	Affiliates; offering service providers; vendors; the public (Issuer principal disclosures); regulators
Financial information	Annual income, net worth, accredited investor verification documents, prior Regulation CF investments	Affiliates; Issuers; offering service providers; vendors; regulators
Inferences	Investment interests and preferences derived from the information above	Affiliates; vendors
Sensitive personal information	Social Security number, government identification number, financial account information with any required access credentials, citizenship	Affiliates; offering service providers; vendors; regulators

Sale and Sharing. We do not sell personal information for monetary consideration. [However, our use of advertising Cookies provided by third parties, as described in "**COOKIES AND OTHER TRACKING TECHNOLOGIES**" above, may be considered a "sale" or "sharing" of identifiers and internet or other electronic network activity information under the CCPA. You may opt out by clicking the "Do Not Sell or Share My Personal Information" link in the footer of the Site or by enabling a Global Privacy Control signal in your browser.][10] We do not knowingly sell or share the personal information of consumers under sixteen (16) years of age.

Sensitive Personal Information. We use and disclose sensitive personal information only for purposes permitted by the CCPA without offering a right to limit, such as providing the Services you request, verifying your identity, complying with law, and preventing fraud.

Retention. We retain each category of personal information for the period described in "**DATA RETENTION**" above.

Shine the Light. If you are a California resident and have an established business relationship with us, California Civil Code § 1798.83 permits you to request information regarding the disclosure of your personal information by us to third parties for the third parties' direct marketing purposes

[10]**Note to Client**: Your current draft states that you use advertising Cookies from Google, Facebook and similar companies. Under the California Consumer Privacy Act (as amended by the California Privacy Rights Act) and several other state privacy laws, disclosing personal data through advertising Cookies for cross-context behavioral advertising may be treated as a "sale" or "sharing" of personal data, which triggers an opt-out right, a "Do Not Sell or Share My Personal Information" link and an obligation to honor Global Privacy Control signals. We have drafted the bracketed language below on the assumption that you will use advertising Cookies. If you will not use advertising Cookies, we can instead state that you do not sell or share personal data (as Republic does) and delete the opt-out language.

(as those terms are defined in that statute). To make such a request, please send an email to [insert email address] with the subject line "Shine the Light Request" or write us: [insert physical address].

Notice to Nevada Residents

Nevada law allows Nevada residents to opt-out of the sale of certain types of personal information. Subject to several exceptions, Nevada law defines "sale" to mean the exchange of certain types of personal information for monetary consideration to another person. We do not currently sell personal information as defined in the Nevada law. However, if you are a Nevada resident, you still may submit a verified request to opt-out of sales and we will record your instructions and incorporate them in the future if our policy changes. Opt-out requests may be sent to [insert email address].

14. YOUR PERSONAL DATA AND YOUR RIGHTS – EUROPE AND THE UNITED KINGDOM ONLY

If you are in a country in the European Economic Area, Switzerland or the United Kingdom, you are entitled to the following explanation of the legal bases we rely on to process your Personal Data and a description of your privacy rights.

Legal Bases for Processing Your Personal Data

The legal basis for collecting and using the Personal Data described above will depend on the Personal Data concerned and the specific context in which we collect it.

Consent

We may process your Personal Data based on your consent such as when you create an account or when you ask us to send certain kinds of marketing communications. You have the right to withdraw your consent at any time without affecting the lawfulness of the processing based on consent before its withdrawal.

Our Legitimate Interests

We may process your Personal Data if doing so is necessary for our legitimate interests and your rights as an individual do not override those legitimate interests. For example, when we process your Personal Data to carry out fraud prevention activities and activities to increase network and information security, to market directly to you, to expand our business activities and to improve our services and the content and functionality of our Site.

To Perform a Contract

We may process your Personal Data to administer and fulfill contractual obligations to you, such as processing your investments and delivering your Tokenized Securities.

To Enable Us to Comply with a Legal Obligation

We may process your Personal Data to comply with legal obligations to which we are subject. This may include identity verification, anti-money laundering and sanctions screening, securities law and recordkeeping requirements, any requirement to produce audited accounts, and compliance with legal process.

Necessary for the Exercise or Defense of Legal Claims

If you bring a claim against us or we bring a claim against you, we may process your Personal Data in relation to that claim.

If you have any questions about or need further information concerning the legal basis on which we collect and use your Personal Data for any specific processing activity, please contact us using the "**HOW TO CONTACT US**" section below.

Your Rights

Access Your Personal Data

You have the right to obtain from us confirmation as to whether or not we are processing Personal Data about you and, if so, the right to be provided with the information contained in this Privacy Policy. You also have the right to receive a copy of the Personal Data undergoing processing.

Rectify Your Personal Data

You have the right to ask us to rectify any inaccurate Personal Data about you and to have incomplete Personal Data completed.

Restrict Our Use of Your Personal Data

You have the right to ask us to place a restriction on our use of your Personal Data if one of the following applies to you:

- You contest the accuracy of the information that we hold about you, while we verify its accuracy;
- We have used your information unlawfully, but you request us to restrict its use instead of erasing it;
- We no longer need the information for the purpose for which we collected it, but you need it to deal with a legal claim; or
- You have objected to us using your information, while we check whether our legitimate grounds override your right to object.

Object to Our Use of Your Personal Data

You have the right to object to our use of your Personal Data where our reason for using it is based on our legitimate interests or your consent (rather than when the reason for using it is to perform an obligation due to you under a contract with us). You may object at any time to our use of your Personal Data for direct marketing purposes.

Delete Your Personal Data

You can ask us to delete your Personal Data if:

- We no longer need it for the purposes for which we collected it;
- We have been using it with no valid legal basis;
- We are obligated to erase it to comply with a legal obligation to which we are subject;

- We need your consent to use the information and you withdraw consent; or
- You object to us processing your Personal Data where our legal basis for doing so is our legitimate interests and there are no overriding legitimate grounds for the processing.

However, this right is not absolute. Even if you make a request for deletion, we may need to retain certain information for legal or administrative purposes, such as record keeping required by securities and anti-money laundering laws, maintenance of opt-out requirements, defending or making legal claims, or detecting fraudulent activities. In addition, we cannot delete information recorded on a public blockchain. We will retain information in accordance with the "**DATA RETENTION**" section above.

If you do exercise a valid right to have your Personal Data deleted, please keep in mind that deletion by third parties to whom the information has been provided might not be immediate and that the deleted information may persist in backup copies for a reasonable period (but will not be available to others).

Transfer Your Personal Data to Another Service Provider

You may request that we transfer some of the Personal Data you have provided to you or another service provider in electronic copy. This applies to Personal Data we are processing to service a contract with you and to Personal Data we are processing based on your consent.

To exercise any of these rights, please contact us as described in the "**HOW TO CONTACT US**" section below. We may need to verify your identity before responding, and we will respond within one (1) month of receiving your verified request, which may be extended where permitted by law.

Make a Complaint

If you have any concerns or complaints regarding our processing of your Personal Data, please contact us as described in the "**HOW TO CONTACT US**" section below and we will do our best to answer any question and resolve any complaint to your satisfaction.

If, for whatever reason, you feel we do not meet the standards you expect of us, you are also entitled to make a complaint to your local supervisory authority:

- EU Data Protection Authorities (DPAs): https://edpb.europa.eu/about-edpb/board/members_en
- Swiss Federal Data Protection and Information Commissioner (FDPIC): https://www.edoeb.admin.ch
- Information Commissioner's Office (United Kingdom): https://ico.org.uk/make-a-complaint/

15. CHANGES TO THIS PRIVACY POLICY

From time to time, we may change this Privacy Policy. If we do, we will post an amended version on this webpage and update the "Last Updated" date above. If we make material changes to how we collect, use or share your personal data, we will provide additional notice, such as by email to the address associated with your account or by a prominent notice on the Site, before the changes take effect, and we will obtain your consent where required by law. Please review this Privacy

Policy periodically. Your continued use of the Site or Services after an amended Privacy Policy takes effect means that you acknowledge the amended Privacy Policy.

16. HOW TO CONTACT US

To contact us for questions or concerns about our privacy policies or practices, or to exercise any of your privacy rights, please contact us at:[11]

[40 Acres Funding Portal LLC]
Attn: Privacy Compliance
[insert physical address]
Email: [privacy@●.com]
Toll-free: [insert toll-free number]

[11] **Note to Client**: Please insert a contact method here. We recommend using one email address for this policy (e.g., privacy@[domain]). Offering a toll-free number is also required for certain CCPA requests unless you operate exclusively online and have a direct relationship with consumers.