

PRIVACY POLICY

Last updated October 04, 2025

This Privacy Notice for **CIO Capital Group, LLC** (doing business as **The CIO Group**) ("we," "us," or "our"), describes how and why we might access, collect, store, use, and/or share ("process") your personal information when you use our services ("**Services**"), including when you:

- Visit our website at ciogroup.com or any website of ours that links to this Privacy Notice
- Engage with us in other related ways, including any sales, marketing, or events

Questions or concerns? Reading this Privacy Notice will help you understand your privacy rights and choices. If you do not agree with our policies and practices, please do not use our Services. If you still have any questions or concerns, please contact us at info@ciogroup.com.

SUMMARY OF KEY POINTS

This summary provides key points from our Privacy Notice, but you can find out more details about any of these topics by using our table of contents below to find the section you are looking for.

What personal information do we process? When you visit, use, or navigate our Services, we may process personal information depending on how you interact with us and the Services, the choices you make, and the products and features you use.

Do we process any sensitive personal information? We do not process sensitive personal information.

Do we collect any information from third parties? We do not collect any information from third parties.

How do we process your information? We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent.

In what situations and with which parties do we share personal information? We may share information in specific situations and with specific third parties.

How do we keep your information safe? We have adequate organizational and technical processes and procedures in place to protect your personal information. However, no electronic

transmission over the internet or information storage technology can be guaranteed to be 100% secure.

What are your rights? Depending on where you are located geographically, the applicable privacy law may mean you have certain rights regarding your personal information.

How do you exercise your rights? The easiest way to exercise your rights is by submitting a data subject access request, or by contacting us. We will consider and act upon any request in accordance with applicable data protection laws.

1. WHAT INFORMATION DO WE COLLECT?

Personal information you disclose to us

***In Short:** We collect personal information that you provide to us.*

We collect personal information that you voluntarily provide to us when you register on the Services, express an interest in obtaining information about us or our products and Services, when you participate in activities on the Services, or otherwise when you contact us.

Personal Information Provided by You. The personal information that we collect depends on the context of your interactions with us and the Services, the choices you make, and the products and features you use. The personal information we collect may include the following:

- names
- phone numbers
- email addresses
- job titles
- contact preferences
- contact or authentication data

Sensitive Information. We do not process sensitive information.

All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information.

Information automatically collected

***In Short:** Some information — such as your Internet Protocol (IP) address and/or browser and device characteristics — is collected automatically when you visit our Services.*

We automatically collect certain information when you visit, use, or navigate the Services. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Services, and other technical information.

Like many businesses, we also collect information through cookies and similar technologies.

The information we collect includes:

- *Log and Usage Data.* Log and usage data is service-related, diagnostic, usage, and performance information our servers automatically collect when you access or use our Services.
- *Device Data.* We collect device data such as information about your computer, phone, tablet, or other device you use to access the Services.
- *Location Data.* We collect location data such as information about your device's location, which can be either precise or imprecise.

Google API

Our use of information received from Google APIs will adhere to Google API Services User Data Policy, including the Limited Use requirements.

2. HOW DO WE PROCESS YOUR INFORMATION?

***In Short:** We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent.*

We process your personal information for a variety of reasons, depending on how you interact with our Services, including:

- **To facilitate account creation and authentication and otherwise manage user accounts.** We may process your information so you can create and log in to your account, as well as keep your account in working order.
- **To deliver and facilitate delivery of services to the user.** We may process your information to provide you with the requested service.
- **To respond to user inquiries/offer support to users.** We may process your information to respond to your inquiries and solve any potential issues you might have with the requested service.
- **To save or protect an individual's vital interest.** We may process your information when necessary to save or protect an individual's vital interest, such as to prevent harm.

3. WHAT LEGAL BASES DO WE RELY ON TO PROCESS YOUR PERSONAL INFORMATION?

In Short: We only process your personal information when we believe it is necessary and we have a valid legal reason to do so under applicable law.

If you are located in the EU or UK, this section applies to you.

The General Data Protection Regulation (GDPR) and UK GDPR require us to explain the valid legal bases we rely on in order to process your personal information. As such, we may rely on the following legal bases:

- **Consent.** We may process your information if you have given us permission to use your personal information for a specific purpose. You can withdraw your consent at any time.
- **Performance of a Contract.** We may process your personal information when we believe it is necessary to fulfill our contractual obligations to you.
- **Legal Obligations.** We may process your information where we believe it is necessary for compliance with our legal obligations.
- **Vital Interests.** We may process your information where we believe it is necessary to protect your vital interests or the vital interests of a third party.

If you are located in Canada, this section applies to you.

We may process your information if you have given us specific permission to use your personal information for a specific purpose, or in situations where your permission can be inferred. You can withdraw your consent at any time.

4. WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?

In Short: We may share information in specific situations described in this section and/or with the following third parties.

We may need to share your personal information in the following situations:

- **Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- **Affiliates.** We may share your information with our affiliates, in which case we will require those affiliates to honor this Privacy Notice.

- **Business Partners.** We may share your information with our business partners to offer you certain products, services, or promotions.

5. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

In Short: We may use cookies and other tracking technologies to collect and store your information.

We may use cookies and similar tracking technologies to gather information when you interact with our Services. We also permit third parties and service providers to use online tracking technologies on our Services for analytics and advertising.

Google Analytics

We may share your information with Google Analytics to track and analyze the use of the Services. The Google Analytics Advertising Features that we may use include: Google Analytics Demographics and Interests Reporting. To opt out of being tracked by Google Analytics, visit <https://tools.google.com/dlpage/gaoptout>.

6. DO WE OFFER ARTIFICIAL INTELLIGENCE-BASED PRODUCTS?

In Short: We offer products, features, or tools powered by artificial intelligence, machine learning, or similar technologies.

As part of our Services, we offer products, features, or tools powered by artificial intelligence, machine learning, or similar technologies (collectively, "AI Products"). Our AI Products are designed for AI applications.

7. HOW DO WE HANDLE YOUR SOCIAL LOGINS?

In Short: If you choose to register or log in to our Services using a social media account, we may have access to certain information about you.

Our Services offer you the ability to register and log in using your third-party social media account details. Where you choose to do this, we will receive certain profile information about you from your social media provider.

8. HOW LONG DO WE KEEP YOUR INFORMATION?

In Short: We keep your information for as long as necessary to fulfill the purposes outlined in this Privacy Notice unless otherwise required by law.

We will only keep your personal information for as long as it is necessary for the purposes set out in this Privacy Notice, unless a longer retention period is required or permitted by law. No purpose in this notice will require us keeping your personal information for longer than the period of time in which users have an account with us.

9. HOW DO WE KEEP YOUR INFORMATION SAFE?

In Short: We aim to protect your personal information through a system of organizational and technical security measures.

We have implemented appropriate and reasonable technical and organizational security measures designed to protect the security of any personal information we process. However, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure.

10. DO WE COLLECT INFORMATION FROM MINORS?

In Short: We do not knowingly collect data from or market to children under 18 years of age or the equivalent age as specified by law in your jurisdiction.

We do not knowingly collect, solicit data from, or market to children under 18 years of age, nor do we knowingly sell such personal information. If you become aware of any data we may have collected from children under age 18, please contact us at info@ciogroup.com.

11. WHAT ARE YOUR PRIVACY RIGHTS?

In Short: Depending on your state of residence in the US or in some regions, such as the European Economic Area (EEA), United Kingdom (UK), Switzerland, and Canada, you have rights that allow you greater access to and control over your personal information. You may review, change, or terminate your account at any time.

In some regions, you have certain rights under applicable data protection laws. These may include the right to request access and obtain a copy of your personal information, request rectification or erasure, restrict the processing of your personal information, and if applicable, to data portability.

Withdrawing your consent

If we are relying on your consent to process your personal information, you have the right to withdraw your consent at any time. You can withdraw your consent by contacting us.

Account Information

If you would at any time like to review or change the information in your account or terminate your account, you can contact us using the contact information provided.

12. CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers include a Do-Not-Track ("DNT") feature or setting. At this stage, no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals.

13. DO UNITED STATES RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?

In Short: If you are a resident of California, Colorado, Connecticut, Delaware, Florida, Indiana, Iowa, Kentucky, Maryland, Minnesota, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Rhode Island, Tennessee, Texas, Utah, or Virginia, you may have the right to request access to and receive details about the personal information we maintain about you.

Categories of Personal Information We Collect

Category	Examples	Collected
A. Identifiers	Contact details, such as real name, alias, postal address, telephone or mobile contact number, unique personal identifier, online identifier, Internet Protocol address, email address, and account name	YES

Category	Examples	Collected
B. Personal information as defined in the California Customer Records statute	Name, contact information, education, employment, employment history, and financial information	YES
C. Protected classification characteristics under state or federal law	Gender, age, date of birth, race and ethnicity, national origin, marital status, and other demographic data	YES
I. Professional or employment-related information	Business contact details in order to provide you our Services at a business level or job title, work history, and professional qualifications	YES
K. Inferences drawn from collected personal information	Inferences drawn from any of the collected personal information listed above to create a profile about preferences and characteristics	YES

Your Rights

You have rights under certain US state data protection laws. These rights include:

- **Right to know** whether or not we are processing your personal data
- **Right to access** your personal data
- **Right to correct** inaccuracies in your personal data
- **Right to request** the deletion of your personal data
- **Right to obtain a copy** of the personal data you previously shared with us
- **Right to non-discrimination** for exercising your rights

14. DO WE MAKE UPDATES TO THIS NOTICE?

In Short: Yes, we will update this notice as necessary to stay compliant with relevant laws.

We may update this Privacy Notice from time to time. The updated version will be indicated by an updated "Revised" date at the top of this Privacy Notice.

15. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?

If you have questions or comments about this notice, you may email us at info@ciogroup.com or contact us by post at:

CIO Capital Group, LLC
41 Madison Avenue
New York, NY 10010
United States

16. HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?

You have the right to request access to the personal information we collect from you, details about how we have processed it, correct inaccuracies, or delete your personal information. To request to review, update, or delete your personal information, please fill out and submit a data subject access request.