Privacy Notice

FLIP FLOW OPERATIONS LLC

1. Who we are and what this notice covers

FLIP FLOW OPERATIONS LLC, a Delaware limited liability company ("Operations," "we," "us" or "our"), operates the Flip Flow website and related online services, including account access, document exchange and project-reporting functionality (the "Platform").

This notice explains how Operations handles personal information in connection with the Platform. It applies to visitors, prospective investors, registered users, property operators and other individuals who interact with us through the Platform.

Investment offerings are made by the issuers identified in the relevant offering materials. An issuer or its authorized manager determines how investor information is used for accreditation verification, subscription decisions and investment administration. Its applicable privacy disclosures govern those activities.

Where Operations collects, hosts or transmits investor information on an issuer's behalf, it acts within the scope of that service arrangement and applicable law. Operations remains responsible for its own processing activities. Where privacy law distinguishes controllers from processors or service providers, the applicable role depends on who determines the purposes and means of the particular processing activity.

FLIP FLOW HQ INC., a Delaware corporation, owns or licenses relevant Flip Flow intellectual property. Ownership of intellectual property does not itself give HQ unrestricted access to personal information held through the Platform.

2. Information we collect

The information collected depends on the services you use and the information you provide.

Contact and account information. Names, email addresses, telephone numbers, business details, account identifiers, authentication information and account preferences.

Communications and requests. Messages, inquiries, support requests, feedback and records of communications with us.

Investor-related information handled through the Platform. Where you use a designated subscription or document-upload feature, this may include your address, date of birth, identity documents, tax identification details, entity ownership or authority information, signed

documents, proposed investment amount and subscription status. Where an issuer requests supporting accreditation materials through the Platform, these may include income, asset, liability or financial statements, tax records or professional verification letters. The specific request will explain what is required and to whom it is submitted.

Project and business information. Information supplied by property operators or authorized users, including professional contact details, project reports, communications, photographs and documents that may identify individuals.

Device and usage information. Information generated when you access the Platform, such as IP address, browser and device characteristics, pages or functions accessed, timestamps, referring pages, authentication events and security logs.

Payment-administration information. Where necessary for an authorized workflow, payment references, confirmation of receipt or other information needed to reconcile a subscription or investigate a payment issue. Providing this functionality does not mean that Operations receives investor subscription money into its own operating account.

Please provide only information requested for the relevant purpose. Do not upload sensitive documents into public areas or send them through channels not designated for their submission.

3. Sources of information

We obtain information directly from you, through your use of the Platform, and from persons authorized to act for you.

Where relevant to a service you request, we may also receive information from the applicable issuer or manager, property operators, document-signing providers and other service providers. For example, an issuer may provide an application status or verification outcome without providing the underlying financial documents. Operations maintains website account settings and technical logs for Platform administration. Documents submitted for a particular issuer are routed to that issuer or its authorized reviewer; they are not automatically distributed to other issuers. A verification outcome may be recorded separately from the underlying evidence.

If you provide information about another person, you must have an appropriate basis to do so and provide any notice required by applicable law.

4. How Operations uses information

We use personal information as reasonably necessary to:

- Create and administer accounts, authenticate users and manage access.
- Provide website functionality, document exchange and project reporting.

- Route information and requests to the issuer or manager you identify or interact with.
- Provide administrative support for the relevant issuer's subscription and verification process.
- Respond to inquiries and communicate about accounts, service changes and requested activities.
- Maintain, troubleshoot and improve the Platform.
- Detect and investigate fraud, unauthorized access, altered payment instructions and other security incidents.
- Maintain records, comply with applicable obligations and establish, exercise or defend legal claims.
- Send updates or marketing communications where permitted, subject to applicable consent and opt-out requirements.

We do not treat acceptance of the website Terms of Use as blanket consent to unrelated marketing or unrestricted sharing of financial documents.

5. Accreditation and investment information

The applicable issuer is responsible for determining whether its verification process satisfies the requirements of its offering. Operations may provide administrative and technical assistance, including collecting documents, transmitting them to authorized reviewers and recording a verification result.

Submission through the Platform does not necessarily mean that Operations makes the accreditation determination. Nor does it mean that Operations cannot access the documents: access depends on the submission method and authorized support arrangements.

Before providing sensitive documents, review the identity of the receiving issuer or reviewer and any privacy notice presented with the request. If you submit information directly to an external reviewer, its handling of that information is governed by its applicable notice.

We do not publish investors' identity documents, tax records or accreditation materials as public website content. Access to those materials is restricted by role. Authorized issuer or manager reviewers may access documents submitted for their review. Operations personnel may access them only where necessary for their assigned document-administration, technical-support, security or compliance duties. Service providers may access them only within their authorized service functions. General website visitors and unrelated issuers or property operators do not receive access merely because they use the Platform.

6. When information is disclosed

We disclose relevant information only for an identified purpose, including:

Issuers and authorized managers. To process an inquiry, subscription or other activity you initiate, administer an existing investment or provide requested reporting. This may include verification materials submitted through the Platform for that issuer's review.

Service providers. To providers supporting hosting, storage, authentication, document signing, communications, technical support, security and other Platform functions. Access should be limited to the services performed and subject to appropriate contractual restrictions.

Affiliated entities. Where reasonably necessary to provide an identified service, support security or compliance, or perform authorized administrative functions. Affiliation alone does not justify unrestricted access to investor documents or their use for unrelated marketing.

Property operators and project participants. To the extent necessary for authorized project functions. Their participation in a project does not by itself entitle them to investors' identity documents, tax returns or accreditation files.

Professional advisers and insurers. Where necessary for legal, accounting, audit, insurance, incident response or claims-handling purposes, subject to applicable confidentiality and legal restrictions.

Authorities and other persons where legally justified. To comply with applicable law or valid legal process, protect rights and safety, investigate fraud or pursue lawful remedies.

Business transactions. Where reasonably necessary for a proposed or completed merger, acquisition, restructuring or transfer of relevant business assets, subject to appropriate confidentiality safeguards and applicable law. A transaction does not authorize incompatible new uses without any notice, consent or other legal basis required by law.

At your direction. Where you request or authorize a particular disclosure.

We do not give every issuer access to every registered user's sensitive documents merely because its offering appears on the Platform.

7. Cookies and similar technologies

The Platform may use cookies, local storage and similar technologies to support authentication, security, session management and user preferences. Server logs may also record device and usage information.

Where optional analytics, advertising or other nonessential technologies are used, their purposes and available choices will be explained through the applicable cookie notice or preference controls. Where consent is required, those technologies will not be activated before the required consent is obtained.

Browser settings may allow you to block or delete cookies, although some Platform features may then be unavailable. Where applicable law requires us to recognize an opt-out preference signal, we will do so for the processing covered by that requirement.

8. Marketing and choices

You may unsubscribe from marketing emails using the link in the message or contact us through the website's Contact page. Unsubscribing does not stop essential communications concerning account security, a requested service or an existing investment.

You may choose not to provide requested information. However, the relevant service or investment process may then be unavailable. Withdrawing consent does not affect processing already lawfully undertaken and does not require deletion of information that must be retained under another lawful basis.

9. Security and payment fraud

We use reasonable administrative, technical and organizational safeguards appropriate to the nature of the information and services. No website, email system or transmission method can be guaranteed completely secure.

Use strong account credentials, protect your devices and report suspected unauthorized access promptly. Before sending investment funds, verify payment instructions through an independently established contact with the issuer, manager or authorized escrow provider. Do not use a newly supplied telephone number as the sole means of verifying instructions delivered with that number.

If you suspect a fraudulent transfer, contact your bank immediately and notify us through verified contact details. We will respond to incidents affecting our systems and provide notifications as required by applicable law.

This notice does not guarantee insurance coverage or reimbursement of fraudulent payments, and it does not waive our applicable security or privacy obligations.

10. Retention and deletion

Operations applies the following retention schedule to information under its control:

Information	**Retention period**
Contact inquiries that do not result in an account or investment	12 months after the last substantive interaction

Information	Retention period
Account profiles and preferences	While the account is active, then 12 months after closure
Routine support correspondence	24 months after the request is resolved
Routine website and access logs	90 days after creation
Security logs and records of changes to payment instructions	24 months after creation
Raw identity and accreditation documents temporarily collected for an issuer	Operations' temporary working copies are deleted within 90 days after both confirmed handover to the issuer or its designated recordkeeper and completion of Operations' assigned review
Investment records hosted for an issuer, including documents for which Operations is its designated recordkeeper	According to the issuer's documented retention instructions and applicable recordkeeping requirements, as explained in its privacy disclosures
Deleted information remaining in routine backups	Overwritten or deleted within 90 days after removal from active systems

The account-profile period does not determine retention of separately categorized documents or logs. Closing an account does not automatically delete investment records held for an issuer.

Temporary accreditation working copies are distinct from the verification evidence retained by the issuer or its designated recordkeeper. Operations does not delete the issuer's only verification evidence under the temporary-copy rule. Where Operations is the designated recordkeeper, the investment-record category applies instead.

At the end of the applicable period, information is deleted, securely destroyed or irreversibly de-identified. De-identified information will not be used to identify you. Deleted information in routine backups is not used for ordinary business activities. If a backup is restored, applicable deletion instructions are reapplied.

You may request deletion through the website's Contact page. We will verify and assess the request as described in Section 11, explain any information that remains subject to issuer recordkeeping instructions, and apply approved deletions to active systems and the backup cycle described above.

11. Your privacy requests

Depending on your location and applicable law, you may have rights to request access to your information, obtain a copy, correct inaccuracies, request deletion, restrict or object to certain processing, withdraw consent or exercise applicable opt-out rights.

Submit requests to FLIP FLOW OPERATIONS LLC through the website's Contact page, identifying the message as a privacy request. Do not include passwords, complete bank details or unnecessary identity documents in the initial request.

We may need proportionate information to verify your identity or an authorized representative's authority. We will respond within the period required by applicable law. Some requests may be limited by legal recordkeeping requirements, the rights of others or applicable exemptions.

If the request concerns information controlled by an issuer or manager, we will explain that distinction and, where appropriate, assist with directing the request to the responsible party.

Where applicable law provides a right to appeal our decision, you may use the same contact channel and identify your request as a privacy appeal. You may also complain to the competent privacy regulator or other authority. We will not unlawfully discriminate against you for exercising privacy rights.

12. Processing locations and additional notices

Personal information may be processed in the United States and other locations where authorized providers or personnel perform the relevant services. Applicable protections may differ between jurisdictions. Where a transfer is subject to legal restrictions, the required safeguards or other lawful transfer mechanism must be in place.

This notice does not represent that registration in Delaware alone determines which privacy laws apply. Where additional jurisdiction-specific disclosures, financial privacy notices, consent mechanisms or rights are required, they will be provided for the relevant processing.

13. Children

The Platform is intended for adults and is not directed to children under 18. We do not knowingly collect personal information from children under 18 through account registration. If you believe a child has provided information, contact us so that we can investigate and take appropriate action.

14. External services

Links or integrations may take you to services operated by issuers, verification providers or other third parties. Review their notices before submitting personal information. Their separate obligations do not excuse Operations from responsibility for its own handling of information.

15. Changes and contact

We may update this notice to reflect changes in our practices or applicable requirements. Material changes will be communicated through the Platform or another appropriate channel. Where required, we will obtain consent before materially different processing begins.

For privacy questions or requests, contact **FLIP FLOW OPERATIONS LLC** using the contact method on the Flip Flow website’s Contact page.