NSDQ TOKENS, LP
Privacy Policy
2025-08-21

Introduction

This Privacy Policy explains how NSDQ-ETF-COIN, LP ("NSDQ Tokens," "we," "us," or "our") collects, uses, and protects personal information when you use our official website www.nsdq-etf-coin.com and related investor portal ("Site"). We are committed to safeguarding your privacy in compliance with applicable data protection laws in the United States and the European Union (EU), including the EU General Data Protection Regulation (GDPR). This Policy describes what information we collect and why, how we use cookies and basic tracking tools, how we store and protect data, our legal bases for processing (for EU users), your rights regarding your personal data, our data retention practices, and how you can contact us with privacy questions or concerns. By using our Site or services, you agree to the practices described in this Privacy Policy (to the extent permitted by law). If you do not agree, please discontinue use of the Site.

Information We Collect and Why

We collect personal and financial information from you when you interact with our investor portal or website. The types of information we collect, and the purposes for collecting them, include.

- **Identification and Contact Information.** This includes data such as your name, postal address, email address, phone number, date of birth, and other identifiers. We collect this information to verify your identity, create and manage your investment account, communicate with you about your account (e.g. investment confirmations, account statements), and fulfill our contractual obligations to you.

- **Financial Information.** This includes financial and account details you provide, such as bank account numbers, wire transfer instructions, payment card information (if applicable), your Social Security number or other taxpayer ID, and details about your investments or holdings. We use this information to process investment transactions (e.g., contributions, distributions, or withdrawals), maintain account balances, execute your instructions, and comply with financial regulations (such as tax reporting). This financial data is necessary for us to provide our investment services and for our everyday business purposes like processing transactions and maintaining your accounts.

- **Compliance and KYC Documentation.** We may collect copies of Know Your Customer (KYC) and Anti-Money Laundering (AML) documents that you or regulators provide, such as government-issued identification (passport, driver's license), national identification numbers (e.g., SSN), proof of address (like utility bills), or other due diligence materials. We collect and use this information to verify your identity and meet legal obligations under applicable anti-fraud, AML, and investor verification laws. For example, financial regulations may require us to perform KYC checks to prevent money laundering or other financial crimes, and we will only collect and process any sensitive personal data for these compliance purposes as permitted or required by law.

- **Account Credentials.** When you register on our investor portal, we collect a username, password, and similar security information. We use these credentials to secure your account and enable you to log in and access your investment information securely. It is your responsibility to keep login credentials confidential and to use unique, strong passwords to help protect your account.

- **Usage Data and Technical Information.** Like most websites, our Site automatically collects certain technical data when you visit or use it. This may include your Internet Protocol (IP) address, device type, operating system, browser type, browsing actions on our site, and dates/times of access. We also use cookies and similar tracking technologies (described below) to collect information about how you navigate and use our Site. We collect this usage data to help us ensure the Site's functionality and security, to detect and prevent fraud, and to understand and improve how users interact with our website (for example, by compiling anonymous analytics about which pages are visited most often). This information helps us troubleshoot issues, optimize the user experience, and tailor our services to user needs. We do not use this data to identify you for marketing purposes, and we do not combine browsing data with your investment account data in a manner that would violate your privacy.

- **Communication Records.** If you contact us with an inquiry, support request, or feedback (for example, via email or through a contact form), we will collect the information you provide (such as your name, email and the contents of your message). We use this information to respond to your requests or questions and to improve our customer service. We may also keep records of your communications with us for training, quality assurance, and to address any issues or disputes that might arise.

We only collect information that is relevant for the purposes described in this Policy, and we will not use personal data for purposes that are incompatible with those original purposes without your consent or an alternative legal basis. Providing certain personal data may be required by law or necessary to enter into a contract (for instance, we *must* collect identification and financial information to open an investment account and comply with regulations). If you choose not to provide required information, we may not be able to provide you with the requested services or fulfill our legal obligations.

Cookies and Tracking Technologies

Our Site uses cookies and similar basic tracking tools to enhance functionality and analyze website traffic. A cookie is a small text file that our Site saves on your browser or device when you visit. We use cookies for several reasons.

- **Essential Cookies.** Some cookies are strictly necessary for the Site to function properly. For example, if you log into the investor portal, we use a session cookie to keep you securely logged in as you navigate between pages. These cookies are required to provide you with services you have requested (such as accessing secure account areas), and our Site cannot function properly without them. Because they are necessary, they do not require consent.

- **Preference Cookies.** We may use cookies to remember your preferences (e.g. language selection or region) to provide a more convenient experience. This way, you don’t have to re-enter settings each time you visit.

- **Analytics Cookies.** We use basic analytics tools (such as first-party or trusted third-party analytics services) to collect anonymous statistics about how visitors use our Site. For instance, analytics cookies might tell us how many users visited a certain page or how long users stay on the site on average. This information helps us understand website traffic and usage patterns so we can improve the content and performance of our Site. The data collected via analytics cookies does not directly identify you, and we do not use these cookies for advertising or profiling purposes.

Importantly, we do not use any cookies for advertising, marketing, or social media targeting purposes. Our Site does *not* integrate with third-party advertising networks, and we do not share cookie data with unaffiliated third parties for their own marketing. In other words, we do *not* allow third-party trackers to collect your data for advertising. The cookies used are only intended for the functional purposes described above and basic internal analytics.

Cookie Choices. When you first visit our Site, you may see a notice about our use of cookies. By continuing to use the Site, you consent to the placement of cookies as described. You can control or delete cookies through your browser settings at any time. Most web browsers allow you to block or delete cookies; however, please note that if you disable **all** cookies (especially essential cookies), some parts of our Site or services may not function correctly. For example, disabling cookies may prevent you from logging in or may disable features that rely on remembering your settings. For more information about cookies and how to manage them, you can visit allaboutcookies.org.

How We Use Your Information

We use personal information collected from you for the following purposes (each of which may overlap with the reasons described in the "Information We Collect" section).

- **Providing and Managing Services**. We use personal and financial information to provide our investment services to you and carry out our contractual obligations. This includes processing transactions you request, facilitating investments in NSDQ Tokens, LP products, maintaining your account, and providing you with online account access through the portal. For example, we will use your information to open your account, execute investment or redemption orders, send account statements, and otherwise manage your relationship with us.

- **Identity Verification and Legal Compliance.** We use your identification details and KYC documents to verify your identity and fulfill legal requirements. This is essential for complying with laws and regulations such as anti-money laundering (AML), "Know Your Customer" rules, anti-fraud and anti-terrorism financing laws, tax reporting obligations, and any other legal obligations applicable to a financial services company. For instance, we may be required to confirm your identity and screen your information against sanctions or politically exposed persons lists. We will only use sensitive personal data (like government ID numbers or any criminal background information) for lawful compliance purposes and with appropriate safeguards.

- **Communication.** We use your contact information (email, phone, address) to communicate with you regarding your investments and our services. This includes sending mandatory communications such as transaction confirmations, account statements, investor updates, changes to our terms or policies, or other information related to your account and the products you've invested in. We may also respond to your inquiries or support requests using your contact details.

These service and account communications are part of our service to you and are not promotional in nature.

- **Service Improvement and Analytics.** We process usage data and feedback to improve our website and services. Specifically, we analyze how users navigate the Site, troubleshoot performance issues, and evaluate the effectiveness of site features. This helps us optimize user experience, for example by improving navigation or adding new tools that make the investor portal more user-friendly. Analytics also enable us to gauge the interest in our content and understand our investor base better (in aggregate). We rely on this data under our legitimate interest in running and improving our business and website functionality.

- **Security and Fraud Prevention.** We use personal data (particularly usage data like IP addresses and account activity) to protect our Site, your account, and our organization against fraud, abuse, or other illegal activities. This includes monitoring for suspicious activity in user accounts, implementing multi-factor authentication or other security measures where appropriate, enforcing our terms of service, and detecting/preventing cyber-attacks or unauthorized access. These measures help ensure the integrity and safety of our investor portal and your investments.

- **Optional Marketing (if applicable**). Currently, the Company does not share user data with third parties for marketing, and we do not run third-party advertisements on our Site. We will not send you marketing emails or newsletters about other products unless you have explicitly consented or subscribed to such communications. If in the future you choose to subscribe to updates about the Company news or related offerings, we would use your contact information to send those communications, but you will always have the ability to opt out or unsubscribe. Any optional marketing communications will be sent in accordance with applicable law and your preferences.

We do not disclose your information to third parties for their independent marketing or advertising purposes. All uses of your data are limited to the purposes described above or as required/allowed by law.

Legal Basis for Processing (GDPR Notice)

For individuals in the European Economic Area (EEA), United Kingdom, or other regions with similar laws, we are required under the GDPR to explain the legal bases on which we process your personal data. We only process personal data when we have a valid legal basis. These bases include.

- **Performance of a Contract**. We process personal data that is necessary to provide our services and perform our contract with you. For example, when you become an investor or use our portal, we must process your identification, contact, and financial information to open and maintain your account, execute transactions, and provide the services you requested. This contractual necessity is a primary legal basis for our data processing.

- **Legal Obligation**. We process personal data to the extent necessary to comply with our legal obligations. Financial and investment businesses are subject to many laws and regulations (e.g., AML/KYC laws, tax laws, securities regulations). We may be required to collect, report, or retain certain personal information to comply with these laws. For instance, verifying your identity and retaining KYC documentation, reporting certain transaction information to government authorities, or responding to lawful requests (such as court orders or regulatory inquiries) all involve processing data because we are legally obligated to do so. We will not use your data for any purpose that is not permitted by applicable law.

- **Legitimate Interests.** We may process your data as necessary for our legitimate business interests, provided that our interests are not overridden by your data-protection rights. We have a legitimate interest in running an efficient and secure financial business. For example, it is in our legitimate interests to use cookies for basic analytics to improve our website functionality, to process certain data to secure our network and prevent fraud, to communicate with our investors about relevant updates, and to anonymize or aggregate data for business analysis. When relying on legitimate interests, we carefully consider and balance any potential impact on your rights. We *do not* use legitimate interest as a basis for processing sensitive personal data or for any processing that would be unexpected or overly intrusive. You have the right to object to processing based on our legitimate interests in certain cases (see Your Rights below).

- **Consent**. In limited cases, we will ask for your consent before processing your personal data. For example, if we ever wish to use your personal details for a purpose that requires consent (such as using non-essential cookies, or sending marketing emails if you are not a customer), we will obtain your consent first. If you are an EU user, by default we will not place non-essential cookies or send direct marketing without your opt-in consent, as required by law. Where we process data based on your consent, you have the right to withdraw consent at any time. For instance, you can opt out of analytics cookies via your browser or withdraw from marketing emails by unsubscribing. Withdrawing consent will not affect the lawfulness of any processing we conducted prior to your withdrawal. If we rely on consent for any processing, we will make that clear at the point of data collection.

How We Share and Disclose Information

We understand the importance of keeping your personal information confidential. NSDQ Tokens, LP does not sell or rent your personal data to third parties for their own use. We also do not share your information with third-party advertisers or social media platforms. However, in the normal course of business and in compliance with law, there are certain limited situations where we may disclose personal information to others, as detailed below.

- **Service Providers (Processors).** We may share personal data with trusted third-party service providers and contractors who perform services on our behalf and under our instructions. These include, for example, IT hosting and infrastructure providers (to host our website and databases), payment processors or banking partners (to help transfer funds for investments or distributions), identity verification services (to assist with KYC/AML checks), or email delivery services (to send account notifications). When we share data with service providers, we ensure they are bound by appropriate confidentiality and data protection obligations. They are not permitted to use your data for any purpose other than to provide the contracted service to us.

- **Affiliates.** If NSDQ Tokens, LP is part of a group of companies or has affiliates (e.g., subsidiaries or entities under common ownership), we may share information within our corporate family as needed for administration, compliance, and to service your account. Any affiliated entity that accesses your data will do so only in alignment with this Privacy Policy (or under an equivalent level of protection).

- **Legal and Regulatory Disclosures.** We may disclose personal information to government authorities, regulators, or law enforcement if required to do so by law or pursuant to a valid legal process. For instance, we might be obligated to provide information in response to a subpoena, court order, or government inquiry, or to report certain transactions under anti-money laundering laws. We will only disclose what is necessary and will object to overbroad requests where appropriate. Additionally, if we believe disclosure is necessary to prevent fraud, financial crimes, or to protect the rights, property, or safety of NSDQ Tokens, our customers, or the public, we may share information as allowed by law.

- **Business Transfers.** If the Company undergoes a business transaction such as a merger, acquisition, corporate reorganization, or sale of assets, your personal data may be transferred to the successor or acquiring entity as part of the transaction. We would only do this subject to appropriate confidentiality protections, and the new owner would be required to handle your information in accordance with this Privacy Policy (or provide notice of any changes). We will notify you (for example, via a notice on our Site or email) if your data becomes subject to a different privacy policy due to such a transaction.

- **Professional Advisors.** We may share information with our professional advisors (such as attorneys, accountants, auditors) on a need-to-know basis for legitimate business purposes, for example, obtaining legal advice or financial audits. These parties are also bound to confidentiality.

- **With Your Consent.** In situations where you directly request or consent to a disclosure, we will share your information accordingly. For instance, if you use a feature that allows you to invite a friend or link your account with another financial platform and you authorize us to share data, we will do so at your direction. (As of now, our Site does not integrate with third-party login or sharing features, so this would only apply in the future if we introduce such functionality and you choose to use it.)

We do not share personal data with any third parties for their independent marketing or advertising. There are no third-party ads on our Site tracking you. In the event we ever consider sharing information beyond the scope described above, we will update this Policy and, if required, obtain your consent or give you the opportunity to opt out.

When we do share information with third parties (such as service providers or affiliates), we take steps to ensure your data is protected. For example, we sign data processing agreements imposing strict data security and confidentiality requirements. Any third party handling user data on our behalf must agree to maintain its security and only process it for the specific purposes we’ve authorized.

Data Storage and International Transfers

Location of Servers. The Company stores and processes user data on secure servers located in the United States and the European Union. This means that, depending on your location and the aspect of our services you use, your personal information may be stored in or accessed from servers in the U.S., in the EU, or both. We maintain data centers in these regions to ensure reliable service and redundancy.

International Data Transfers. If you are located outside of the United States, please be aware that the personal information you provide to us will likely be transferred to and processed in the United States (and possibly other jurisdictions) where our central systems are located. Likewise, if you are in the EU, and you invest with us, some of your data might be transferred to our U.S. systems for processing (for example, to our headquarters in the U.S.). The U.S. may not have data protection laws as strict as those in your home country, but we value your privacy and apply safeguards to ensure that your personal data remains protected according to this Policy and applicable law.

We have implemented appropriate measures to facilitate lawful cross-border data transfers in compliance with GDPR and other regulations. These measures include, as applicable, using the European Commission's Standard Contractual Clauses (SCCs) in our contracts with service providers or affiliates that receive EU personal data in a third country. The SCCs are standardized contractual commitments approved by the EU to ensure any personal data leaving the EEA will be transferred in compliance with EU data-protection laws. In some cases, we may rely on other transfer mechanisms or international data transfer frameworks if they become available and are recognized by regulators as providing adequate protection.

Regardless of where your data is stored or processed, we will protect it with the same high standards of privacy and security described in this Policy. We also continue to monitor legal developments around international data transfers (such as new adequacy decisions or frameworks) and will implement any additional required safeguards. Personal data stored in foreign jurisdictions may, however, be subject to lawful access requests by courts or law enforcement in those countries (e.g., U.S. authorities could lawfully require access to data stored in the U.S.). In such cases, we will abide by applicable legal processes and safeguard the data to the extent possible.

If you have questions about our data storage locations or international transfer mechanisms, you can contact us (details below).

Data Security

We take the security of your personal information very seriously. NSDQ Tokens, LP has implemented a variety of technical, administrative, and physical security measures to protect your data from unauthorized access, disclosure, alteration, and destruction. These measures include, for example.

- **Encryption.** Sensitive data (such as financial information, passwords, and documents) is encrypted both in transit (using TLS/SSL or similar protocols when you access our Site) and at rest in our databases, to prevent interception or access by unauthorized parties.

- **Access Controls.** We limit access to personal data strictly to employees and service providers who *need* the information to perform their duties (principle of least privilege). All personnel with access to personal data are subject to confidentiality obligations and receive training on data privacy and security. We use authentication measures (such as strong passwords and, for internal access, multi-factor authentication) to ensure only authorized access.

- **Network and System Security.** Our servers are protected by firewalls and network security monitoring. We regularly update and patch our software to address security vulnerabilities. We also employ anti-virus and anti-malware tools, intrusion detection systems, and other safeguards to prevent and detect unauthorized system access.

- **Physical Security.** The data centers where our servers reside have robust physical security controls, such as 24/7 monitoring, access badges, biometric scanners, and guard services, to prevent unauthorized entry. Paper records (if any) are kept in locked facilities with controlled access.

- **Procedural Safeguards.** We have policies and incident response plans in place to handle any suspected data security incidents. We monitor our systems for potential threats and have a business continuity plan and backups to ensure data resiliency. If, despite our safeguards, a data breach were to occur affecting your personal information, we will notify you and the relevant authorities as required by law.

While we strive to protect your information, please note that no method of transmission over the internet or electronic storage is 100% secure. We cannot guarantee absolute security of data. However, we follow industry best practices and security standards to minimize risks. You also play a role in security. we urge you to keep your account credentials confidential and notify us immediately if you suspect any unauthorized access to your account.

Data Retention

We will retain your personal information for as long as necessary to fulfill the purposes outlined in this Privacy Policy, unless a longer retention period is required or permitted by law. In practice, this means.

- **Active Account Duration.** We keep your personal data for as long as you maintain an account with us or as long as is needed to provide you with our services. This allows us to serve your account and provide a continuous experience.

- **Legal and Regulatory Requirements.** Even after you close your account or cease using our services, we may retain certain personal data to comply with legal obligations and regulatory requirements. For example, financial regulations (including AML laws and tax laws) may require us to retain records of transactions and customer identification information for a set period (often several years after the end of the customer relationship). We also retain information as needed to resolve disputes, enforce our agreements, or address any complaints or investigations. We will not keep data longer than necessary, but we must adhere to applicable recordkeeping laws.

- **Internal Business Purposes.** We may retain limited information for internal purposes such as maintaining accurate financial or business records, or for security incident logs. When data is kept for such purposes, we will limit access to it and ensure it's archived securely.

When the retention period for a certain piece of data expires, or if we determine that we no longer have a legitimate purpose for holding it, we will either securely delete or anonymize the data. For example, we may erase personal data from our systems, or remove identifying details so that the information can no longer be associated with you (and thus is no longer personal data).

Data Deletion. In many cases, you have the ability to delete certain information yourself via our investor portal (see Your Rights below). For information that cannot be self-deleted, you may request deletion and we will honor it provided we have no ongoing legitimate need or legal obligation to retain that data. Do note that due to backups and archival systems, complete removal of data may not be instantaneous, but we will ensure that your data is no longer actively processed and is deleted from primary systems and eventually from backups according to our data deletion schedules.

Your Rights and Choices

You have certain rights and choices regarding your personal data. The Company is committed to respecting these rights and has processes to help you exercise them. Your key data protection rights include.

- **Right to Access.** You have the right to request a copy of the personal data we hold about you, and to obtain information about how we process it. We will provide you with a summary of your data, and if required by law, a copy of the actual data, in a commonly used format. (For EU residents, this aligns with the GDPR "right of access.") This allows you to confirm the accuracy of your information and to verify that we are processing it in accordance with the law.

- **Right to Rectification.** If any of your personal information is incorrect or incomplete, you have the right to request that we correct or update it. For example, if you change your contact number or notice an error in your profile data, you can update certain information directly through the investor portal, or ask us to make the correction. We encourage you to keep your information up-to-date and will honor valid correction requests.

- **Right to Erasure (Right to be Forgotten).** You have the right to request deletion of your personal data in certain circumstances. For instance, if you no longer have an account with us or if you withdraw consent (in cases where we rely on consent) and we have no other legal basis to keep your data, you can ask that your data be erased. We will delete the requested data provided there is no legal requirement or overriding legitimate ground for us to retain it. Please note this right is not absolute – for example, we cannot delete data legally required for anti-money laundering compliance, even if you request it, until the mandated retention period expires. We will inform you if that is the case.

- **Right to Restrict Processing.** You have the right to ask us to limit or "freeze" the processing of your data under certain conditions. For example, if you contest the accuracy of your data, you can request restriction while we verify the data's accuracy. Or if you object to our processing (see below) and we are considering your objection, you can request we restrict processing in the interim. When processing is restricted, we can store your data but not use it (except to defend legal claims or as otherwise permitted by law).

- **Right to Object.** You have the right to object to our processing of your personal data in certain scenarios. In particular, you can object to processing based on our legitimate interests or to processing for direct marketing purposes. If we are processing your data on the ground of legitimate interest, you should explain the specific situation of your objection (for example, you believe our interest is outweighed by harm to your privacy). We will consider your objection and either cease the processing or explain why we believe we have compelling legitimate grounds to continue. If you object to direct marketing, we will cease using your data for that purpose immediately.

- **Right to Data Portability.** In cases where we process your data by automated means and on the basis of your consent or a contract, you have the right to receive the personal data you provided to us in a structured, commonly used, machine-readable format, and the right to transmit that data to another controller (or to have us transfer it, where technically feasible). In plain terms, this allows you to take your data to another service. This right is subject to conditions and typically applies to data you actively provided (e.g., registration information) and data generated by your activities (e.g., account transactions), but not to data resulting from our internal analysis.

- **Right to Withdraw Consent.** Where we rely on your consent to process personal data, you have the right to withdraw that consent at any time. For example, if you consented to receive a newsletter, you can unsubscribe at any time (withdrawing consent for marketing). If you consented to optional analytics cookies, you can change your preference to disable them. Withdrawal of consent will not affect the lawfulness of processing that occurred before you withdrew consent, and it won't affect processing under other bases (for instance, data processed under contract or legal obligation isn't erased just because you withdraw a separate consent). If you withdraw consent for something, we will stop the processing that was based on consent.

- **Right to Lodge a Complaint.** If you believe your privacy rights have been violated or you have a concern about our data practices, you have the right to file a complaint with a supervisory authority (such as a Data Protection Authority in the EU or your local privacy regulator). We ask that you please attempt to resolve any issues with us first by contacting us directly. We take privacy concerns seriously and will do our best to address them. However, you always have the right to seek assistance or direct your complaint to the relevant regulator.

These rights may be subject to certain exceptions or limitations based on applicable laws. For example, if your request is manifestly unfounded or excessive, we may refuse it or charge a reasonable fee as allowed by law. We will explain the reasoning if we cannot fulfill a request in full.

How to Exercise Your Rights.

- **Self-Service (via Portal).** Our investor portal provides you with tools to access, update, or delete certain information directly. For instance, you can log in to your account to update your contact information or change preferences. You may also be able to initiate account closure or data deletion for certain fields through the portal settings. We encourage you to use these self-service features for immediate control over your data.

- **Contacting Us.** For rights that cannot be exercised through the portal (or if you prefer assistance), you can submit a request to us at the contact information provided in the Contact Us section below. Please clearly state what right you wish to exercise and provide necessary verifying information (we need to ensure you are the account holder or authorized representative before releasing or deleting data). For example, we may ask you to verify your identity or provide additional details to locate your data. We will respond to your request as soon as possible, and in any event within the timeframe required by law. For most rights (under GDPR), this is one month, which can be extended by an additional two months for complex requests, but we will inform you if an extension is needed.

We will not discriminate against you for exercising any privacy rights. Our goal is to facilitate your control over your personal information.

Data Protection for Children

Our website and services are not directed to individuals under the age of 18. NSDQ Tokens, LP does not knowingly collect personal data from children. If you are under 18 (or the age of majority in your jurisdiction), please do not use the Site or provide any personal information. Investors must be adults or properly represented by adults. If we learn that we have inadvertently collected information from a minor without appropriate consent, we will delete it. Parents or guardians who believe that we might have any information from or about a child may contact us to request deletion.

Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, technologies, legal requirements, or other factors. When we make changes, we will update the “Effective Date” at the top of the Policy. If changes are significant, we may also provide a more prominent notice or seek your consent as required by law. We encourage you to review this Privacy Policy periodically to stay informed about how we are protecting your information. Your continued use of the Site or our services after any changes to this Policy constitutes acceptance of the updated terms (to the extent permitted by law).

Contact Us

If you have any questions, concerns, or notices to provide regarding our privacy policy or our site, please use the Contact Us form on our website. We'll do our best to respond to your inquiries in a timely manner.

By using the Site, you acknowledge that you have read, understood, and agree to this Privacy Policy.