

SUBSCRIBE

Privacy Notice and Policy

Privacy Policy

Effective Date: October 20, 2026

Last Updated: October 20, 2026

This notice explains how SUBSCRIBE handles personal data: as a processor for data our customers submit to our platform, and directly, for data we collect through our own website and hiring process.

1. As a Processor for Our Customers' Data

Our customers — fund managers, fund administrators, and other financial institutions — are the controllers of the personal data submitted to our platform, including identity-verification and tax-reporting data collected under the USA PATRIOT Act, FATCA, or CRS. SUBSCRIBE processes that data only on our customers' documented instructions, under a written agreement, and does not determine why or how it is used.

2. How We Handle That Data

- We use it only to provide our services, or as our customer instructs in writing, and will not use it for a materially different purpose without our customer's authorization.
- We keep it accurate and relevant to the purpose for which our customer submitted it.
- We keep it confidential and do not use it for our own purposes, including advertising.
- We do not sell it, and do not share it for cross-context behavioral advertising.
- We do not engage a new subprocessor to handle it without our customer's authorization, and we bind every subprocessor by contract to the same data protection obligations we owe our customer.
- We assist our customers, as required by our agreement with them and by law, in responding to data subject requests, conducting data protection impact assessments, and notifying affected individuals of a breach.
- We return or delete this data at the end of our agreement with a customer, except where we must retain it by law.

3. Security

We protect personal data using the administrative, technical, and physical safeguards described in our information security program, and notify our customers of any breach affecting their data without undue delay.

4. International Data Transfers

Our servers are located in the United States. Where we transfer personal data out of the UK or European Economic Area — whether submitted by our customers or collected directly as described below — we rely on an adequacy decision, Standard Contractual Clauses, the EU-U.S. Data Privacy Framework, or another lawful safeguard.

5. If Your Data Was Submitted by One of Our Customers

SUBSCRIBE is not the controller of that data and cannot act directly on requests to access, correct, delete, or otherwise manage it. Please contact the applicable customer (for example, your fund manager or fund administrator) to exercise your rights; we support them in responding as required by our agreement with them and by law.

6. Information We Collect Through Our Website or Platform

Separately from the above, when you visit our website, request a demo, contact us, subscribe to updates, or apply for a job with us, we collect:

- Directly from you: name, email address, phone number, mailing address, and the content of any message you send us
- Automatically: IP address, browser and device type, and pages visited, through cookies and similar technologies (see our Cookie Policy)

We use this information only for the purposes described above — to respond to you, operate and improve our website, communicate with you, and evaluate job applications — and keep it accurate for those purposes. We share it only with service providers who are contractually bound to protect it and use it solely to support those activities, or as required by law. We do not sell this information. Where we want to use it for a different purpose, or share it more broadly than described here, we will ask for your consent first.

7. Your Rights in the Information We Collect Through Our Website

Depending on where you live, you may have the right to know, access, correct, delete, or port this information, to opt out of certain sharing, and to not be discriminated against for exercising these rights.

To exercise a right, contact us at privacy@subscribeplatform.com. We will respond within 45 days (most U.S. state laws) or one month (GDPR), and will tell you if we need more time. If you're not satisfied with our response, you may ask our Data Protection Officer to review it; EU/UK residents may also lodge a complaint with their supervisory authority, and U.S. residents with their state Attorney General.

8. Who We Are

Contact us, or our Data Protection Officer, Robert Vaile, at privacy@subscribeplatform.com or 401 Chilean Ave, Palm Beach, FL 33480. Our Data Protection Officer is responsible for the review, approval, monitoring, updating, and enforcement of this notice.

9. Changes to This Notice

We will post any changes here and update the effective date above.