

PLATFORM PRIVACY POLICY

1. Introduction

Funds Club Private Markets LLC, a limited liability company organized under the laws of the State of Delaware, United States ("**Funds Club**", the "**Company**", "**Platform Operator**", "**we**", "**our**", or "**us**"), operates the Funds Club private markets platform (the "**Platform**").

The Platform and its underlying software, technology, design, workflows, analytics, and related intellectual property are owned by **Sky Cliff Professionals GmbH**, a company incorporated in Germany under registration number **HRB 258208 B** ("**Sky Cliff**"), and are licensed to the Company for the operation of the Platform.

This Privacy Policy explains how we collect, use, process, store, disclose, transfer, protect, and otherwise handle Personal Data obtained through the Platform and related services. It also explains the rights and choices available to individuals whose Personal Data we process.

The Platform is designed to facilitate digital investor onboarding, identity verification, subscription management, document management, portfolio administration, investor communications, and other administrative services in connection with private market investment opportunities offered by Branded Operators, Investment Providers, Funds, SPVs, and other authorized participants.

This Privacy Policy applies to all Users of the Platform, including prospective investors, existing investors, representatives of legal entities, Authorized Signatories, Client Managers, Read-Only Users, visitors to the Platform, and other individuals whose Personal Data is processed in connection with the operation of the Platform.

This Privacy Policy should be read together with the Funds Club Platform Terms and Conditions and any other legal notices or policies made available through the Platform. In the event of any inconsistency between this Privacy Policy and the Platform Terms and Conditions with respect to the processing of Personal Data, this Privacy Policy shall prevail solely with respect to matters relating to privacy and the processing of Personal Data.

By accessing or using the Platform, you acknowledge that you have read and understood this Privacy Policy.

2. Definitions

Capitalized terms used but not otherwise defined in this Privacy Policy shall have the meanings assigned to them in the Funds Club Platform Terms and Conditions, as amended from time to time.

For purposes of this Privacy Policy, the following additional definitions shall apply:

"Personal Data" means any information relating to an identified or identifiable natural person, or any equivalent term such as "Personal Information" under Applicable Law.

"Processing" means any operation or set of operations performed on Personal Data, whether or not by automated means, including the collection, recording, organization, structuring, storage, adaptation, alteration, retrieval, consultation, use, disclosure, transmission, dissemination, restriction, deletion, destruction, or any other handling of Personal Data.

"Applicable Privacy Laws" means all applicable laws, regulations, and governmental requirements relating to privacy, data protection, cybersecurity, electronic communications, or the processing of Personal Data, including, where applicable, the General Data Protection Regulation (EU) 2016/679 ("GDPR"), the UK GDPR, the California Consumer Privacy Act ("CCPA"), as amended by the California Privacy Rights Act ("CPRA"), and any other applicable federal, state, national, or international privacy laws.

In the event of any inconsistency between this Privacy Policy and the Platform Terms and Conditions with respect to the processing of Personal Data, this Privacy Policy shall prevail solely with respect to matters relating to privacy and the processing of Personal Data.

3. Scope of this Privacy Policy

This Privacy Policy applies to the collection and processing of Personal Data by the Company in connection with the operation of the Platform and the Services.

Without limitation, this Privacy Policy applies to Personal Data collected through or in connection with:

- (a) the Platform and Client Area;
- (b) the Company's websites and online services;
- (c) User registration and Account administration;
- (d) identity verification, KYC, AML, sanctions screening, tax reporting, and other compliance procedures;
- (e) subscription processes relating to Investment Opportunities;

- (f) electronic execution of Subscription Documents, Offering Documents, and other investment-related documentation;
- (g) portfolio administration, investor reporting, capital calls, distributions, and other post-investment administrative services;
- (h) communications between Users, the Company, Branded Operators, Investment Providers, Third-Party Providers, and other authorized participants through the Platform;
- (i) customer support, technical assistance, training, demonstrations, webinars, events, surveys, and other interactions with the Company;
- (j) cookies, analytics technologies, usage monitoring, security monitoring, and other technologies used in connection with the Platform; and
- (k) any other Services, products, features, functionality, or communications provided by or on behalf of the Company.

This Privacy Policy applies regardless of whether Personal Data is collected directly from the User, through a Branded Operator, Investment Provider, employer, authorized representative, Third-Party Provider, publicly available sources, or any other lawful source.

This Privacy Policy applies to all individuals whose Personal Data is processed by the Company in connection with the Platform, including prospective investors, existing investors, representatives of legal entities, Authorized Signatories, Client Managers, Read-Only Users, website visitors, service providers, and other individuals interacting with the Platform or the Services.

This Privacy Policy does not apply to the privacy practices of Branded Operators, Investment Providers, Funds, SPVs, portfolio companies, or other Third-Party Providers that maintain their own privacy policies or act as independent controllers of Personal Data. Users should review the applicable privacy policies of such third parties where appropriate.

4. Categories of Personal Data We Collect

The categories of Personal Data we collect depend on the Services you use, your interactions with the Platform, the Investment Opportunities in which you participate, and the requirements of the applicable Branded Operator, Investment Provider, or Applicable Law.

Depending on the circumstances, we may collect and process the following categories of Personal Data:

4.1 Account Information

We may collect information required to create and administer your Account, including:

- full name;
- residential and business address;
- email address;
- telephone number;
- username and login credentials;
- preferred language and communication preferences;
- account settings and user role;
- authentication information, including multi-factor authentication credentials; and
- other information required to establish and maintain your Account.

4.2 Identity Verification Information

To facilitate identity verification and compliance procedures, we may collect:

- passport or other government-issued identification;
- proof of address;
- date and place of birth;
- nationality and citizenship;
- tax identification numbers;
- photographs, selfies, video verification, or biometric verification where permitted by Applicable Law;
- source of funds and source of wealth information;
- beneficial ownership information;
- politically exposed person ("PEP") status;
- sanctions screening information;
- investor accreditation or qualification information; and
- other information required for identity verification or regulatory compliance.

4.3 Investment Information

We may collect information relating to your investment activities through the Platform, including:

- Investment Opportunities viewed or subscribed to;
- Subscription Documents and Offering Documents;
- investment preferences;
- investment commitments;
- funding status;
- capital calls;
- distributions;
- portfolio holdings;
- watchlists;
- transaction history;
- investment reports; and
- other records relating to your participation in Investment Opportunities.

4.4 Financial Information

Where necessary in connection with the Services, we may collect:

- bank account information;
- payment instructions;
- transaction confirmations;
- billing information;
- wire transfer information;
- tax forms;
- tax residency information; and
- other financial information required to facilitate Investment Opportunities or Platform administration.

The Company does not store payment card information except where necessary and only through authorized payment service providers.

4.5 Communications

We may collect information contained in communications with or through the Platform, including:

- emails;
- messages;

- customer support requests;
- onboarding communications;
- responses to compliance requests;
- meeting notes;
- communications with Branded Operators and Investment Providers;
- AI-assisted chat interactions, where available; and
- other correspondence relating to the Platform or the Services.

4.6 User Content

Users may voluntarily upload or submit documents and other information through the Platform, including:

- corporate documents;
- powers of attorney;
- investor questionnaires;
- due diligence materials;
- legal agreements;
- supporting documentation;
- correspondence;
- portfolio-related documents; and
- any other information submitted by or on behalf of the User.

4.7 Technical and Usage Information

When you access or use the Platform, we may automatically collect certain technical information, including:

- IP address;
- browser type and version;
- operating system;
- device identifiers;
- login history;
- session information;
- pages viewed;

- actions performed within the Platform;
- access dates and times;
- error logs;
- security logs;
- cookies and similar technologies; and
- other technical information relating to the operation, security, and performance of the Platform.

4.8 Information Obtained from Third Parties

We may receive Personal Data from Branded Operators, Investment Providers, fund administrators, custodians, banks, identity verification providers, sanctions screening providers, publicly available sources, government authorities, data providers, and other Third-Party Providers where such information is necessary for the operation of the Platform, the provision of the Services, or compliance with Applicable Law.

5. How We Use Personal Data

We process Personal Data only where necessary for the operation of the Platform, the provision of the Services, compliance with Applicable Privacy Laws, the Platform Terms and Conditions, contractual obligations, and our legitimate business interests.

Depending on the Services used and the circumstances of the processing, we may use Personal Data for the following purposes:

5.1 Account Administration

To:

- create and administer User Accounts;
- authenticate Users;
- manage User roles and permissions;
- maintain User profiles and preferences;
- provide access to the Platform and its functionality; and
- administer the User's relationship with the Company.

5.2 Identity Verification and Compliance

To:

- perform identity verification;

- facilitate KYC, AML, sanctions screening, investor accreditation, tax verification, beneficial ownership verification, source of funds verification, source of wealth verification, and other compliance procedures;
- detect, investigate, and prevent fraud, financial crime, money laundering, terrorist financing, sanctions evasion, and other unlawful activities; and
- assist Branded Operators, Investment Providers, and authorized Third-Party Providers in satisfying their legal, contractual, and regulatory obligations.

5.3 Investment Administration

To facilitate the administration of Investment Opportunities, including:

- onboarding investors;
- processing Subscription Documents;
- managing subscription workflows;
- communicating funding instructions;
- tracking subscription status;
- maintaining investment records;
- facilitating investor communications;
- portfolio administration;
- capital calls;
- distributions;
- reporting; and
- other post-investment administrative activities.

5.4 Communications

To communicate with Users regarding:

- Account administration;
- identity verification;
- Investment Opportunities;
- Platform functionality;
- customer support;
- security alerts;
- legal notices;

- operational updates;
- service announcements;
- technical assistance; and
- other communications relating to the Platform or the Services.

5.5 Platform Operations and Improvements

To:

- operate, maintain, secure, monitor, and improve the Platform;
- diagnose technical issues;
- detect security incidents;
- analyze Platform usage;
- improve user experience;
- develop new products, services, and functionality;
- perform internal analytics and reporting; and
- ensure the stability, reliability, and performance of the Platform.

5.6 Artificial Intelligence and Automation

Where available, the Company may use artificial intelligence, machine learning, or other automated technologies to:

- organize and classify information;
- summarize documents;
- improve search functionality;
- assist Users in navigating the Platform;
- generate analytics and reports;
- improve Platform functionality; and
- support customer service and operational efficiency.

The Company does not use artificial intelligence to make fully automated investment decisions on behalf of Users.

5.7 Legal and Regulatory Purposes

To:

- comply with Applicable Law;

- respond to lawful requests from courts, regulators, governmental authorities, and law enforcement agencies;
- establish, exercise, or defend legal claims;
- enforce the Platform Terms and Conditions;
- protect the rights, property, and security of the Company, Sky Cliff, Branded Operators, Investment Providers, Users, and Third-Party Providers; and
- satisfy contractual, regulatory, and recordkeeping obligations.

5.8 Marketing and Business Development

Where permitted by Applicable Law, we may use Personal Data to:

- provide information about the Platform and related Services;
- send newsletters, product announcements, event invitations, and educational materials;
- invite Users to webinars, demonstrations, or surveys;
- improve our marketing activities; and
- communicate information that we believe may be relevant to Users.

Users may opt out of marketing communications at any time by following the unsubscribe instructions included in such communications or by contacting the Company. Transactional, legal, compliance, and investment-related communications are not considered marketing communications and cannot be opted out of where they are necessary for the operation of the Platform or the provision of the Services.

6. Legal Bases for Processing

Where Applicable Privacy Laws require a legal basis for the processing of Personal Data, the Company processes Personal Data only where one or more lawful bases apply.

Depending on the circumstances, we may process Personal Data on the following legal bases:

6.1 Performance of a Contract

We process Personal Data where necessary to:

- establish and administer User Accounts;
- provide access to the Platform and the Services;
- facilitate identity verification and onboarding;

- administer Investment Opportunities;
- process Subscription Documents;
- communicate with Users;
- perform our contractual obligations; and
- otherwise provide the Services requested by the User.

6.2 Compliance with Legal Obligations

We process Personal Data where necessary to comply with Applicable Privacy Laws, Applicable Law, court orders, regulatory requirements, governmental requests, contractual obligations, and legal reporting requirements.

Such processing may include identity verification, fraud prevention, sanctions screening, tax reporting, record retention, and cooperation with governmental authorities or regulators.

6.3 Legitimate Interests

We may process Personal Data where such processing is necessary for our legitimate business interests, provided that such interests are not overridden by the rights and freedoms of the individual.

Our legitimate interests may include:

- operating, maintaining, and improving the Platform;
- protecting the security and integrity of the Platform;
- preventing fraud and unauthorized activity;
- providing customer support;
- conducting internal administration;
- improving user experience;
- developing new products and functionality;
- performing internal analytics and business planning;
- enforcing our legal rights; and
- protecting the rights, property, and security of the Company, Sky Cliff, Users, Branded Operators, Investment Providers, and Third-Party Providers.

6.4 Consent

Where required by Applicable Privacy Laws, we process Personal Data based on the User's consent.

Where processing is based on consent, the User may withdraw such consent at any time by updating the relevant privacy settings, where available, by contacting the Company at support@lunedi.investments, or by using any other withdrawal mechanism made available by the Company.

Withdrawal of consent shall not affect the lawfulness of any processing carried out before such withdrawal and shall not affect any processing based on another lawful basis, including the performance of a contract, compliance with legal obligations, or the Company's legitimate interests. Withdrawal of consent may also limit or prevent the User's ability to access certain features of the Platform or continue using the Services where such processing is necessary for the operation of the Platform or the provision of the Services.

6.5 Protection of Legal Rights

We may process Personal Data where necessary to establish, exercise, defend, or enforce legal claims, contractual rights, or other legal interests, or to protect the vital interests of any individual where permitted by Applicable Law.

The legal basis applicable to any particular processing activity may vary depending on the nature of the Services provided, the relationship between the User and the Company, the applicable Branded Operator or Investment Provider, the jurisdiction involved, and the requirements of Applicable Privacy Laws.

7. Identity Verification and Regulatory Compliance

To protect the integrity of the Platform, facilitate private market investment transactions, and support the legal and contractual obligations of Branded Operators, Investment Providers, Funds, SPVs, and other authorized participants, the Company may collect, process, store, disclose, and otherwise use Personal Data for identity verification and compliance purposes.

Depending on the applicable Investment Opportunity, the Company may process Personal Data to:

- verify the identity of Users;
- facilitate Know Your Customer ("KYC") and Anti-Money Laundering ("AML") procedures;
- conduct sanctions screening and politically exposed person ("PEP") screening;
- verify investor eligibility, accreditation, qualification, or professional investor status;
- verify beneficial ownership, source of funds, and source of wealth information;

- facilitate tax reporting, tax residency verification, FATCA, CRS, and similar reporting obligations;
- prevent fraud, identity theft, financial crime, unauthorized access, and other unlawful activities;
- maintain records required for compliance, audit, legal, or contractual purposes; and
- support Branded Operators, Investment Providers, Funds, SPVs, administrators, custodians, banks, and other authorized Third-Party Providers in satisfying their legal, contractual, regulatory, and operational requirements.

The Company may engage specialized Third-Party Providers to perform identity verification, sanctions screening, document verification, fraud detection, and other compliance-related services on its behalf. Such providers are contractually required to process Personal Data only for the purposes authorized by the Company and in accordance with Applicable Privacy Laws.

Users acknowledge that certain Personal Data and supporting documentation may be required before access to particular Platform features or participation in specific Investment Opportunities can be granted. Failure to provide requested information may delay, restrict, or prevent access to certain Services or Investment Opportunities.

The Company may retain compliance-related records for the period required by Applicable Law, contractual obligations, legitimate business purposes, or applicable record retention policies, even after a User's Account has been closed or an Investment Opportunity has been completed.

Nothing in this Privacy Policy shall be interpreted as limiting the ability of Branded Operators, Investment Providers, Funds, SPVs, administrators, custodians, or other authorized participants to conduct their own independent identity verification, compliance, or regulatory procedures in accordance with their own legal obligations and privacy policies.

8. Sharing Personal Data

The Company does not sell Personal Data to third parties.

The Company may share Personal Data only where necessary to operate the Platform, provide the Services, facilitate Investment Opportunities, comply with Applicable Law, protect the security and integrity of the Platform, or otherwise as described in this Privacy Policy.

Depending on the circumstances, Personal Data may be shared with the following categories of recipients:

8.1 Branded Operators and Investment Providers

We may share Personal Data with Branded Operators, Investment Providers, Funds, SPVs, issuers, and other authorized participants where necessary to:

- administer Investment Opportunities;
- facilitate investor onboarding;
- process subscriptions;
- verify investor eligibility;
- manage ongoing investments;
- comply with contractual, legal, or regulatory requirements; and
- communicate with Users regarding their investments.

8.2 Service Providers

We may share Personal Data with Third-Party Providers engaged to support the operation of the Platform, including providers of:

- cloud hosting and infrastructure;
- identity verification;
- sanctions screening;
- electronic signature services;
- payment processing;
- banking services;
- fund administration;
- custodial services;
- cybersecurity;
- data storage;
- customer support;
- analytics;
- artificial intelligence services;
- document management;
- communications; and
- other technology or professional services.

Such service providers are authorized to process Personal Data only on our behalf, for the purposes specified by the Company, and in accordance with Applicable Privacy Laws and appropriate contractual safeguards.

8.3 Professional Advisers

We may disclose Personal Data to our lawyers, auditors, accountants, insurers, tax advisers, consultants, and other professional advisers where reasonably necessary to obtain professional advice, enforce our legal rights, or comply with legal or contractual obligations.

8.4 Regulatory Authorities and Law Enforcement

We may disclose Personal Data where required or permitted by Applicable Law, including to courts, regulators, supervisory authorities, law enforcement agencies, tax authorities, governmental bodies, or other competent authorities.

8.5 Corporate Transactions

If the Company or substantially all of its assets are involved in a merger, acquisition, financing, corporate reorganization, sale of assets, or similar transaction, Personal Data may be disclosed to prospective purchasers, investors, lenders, advisers, or successor entities, subject to appropriate confidentiality obligations and Applicable Privacy Laws.

8.6 Protection of Rights and Security

We may disclose Personal Data where we reasonably believe such disclosure is necessary to:

- protect the rights, property, or security of the Company, Sky Cliff, Branded Operators, Investment Providers, Users, or Third-Party Providers;
- investigate fraud, security incidents, or unlawful activities;
- enforce the Platform Terms and Conditions or other agreements;
- establish, exercise, or defend legal claims; or
- protect the integrity, security, or lawful operation of the Platform.

Except as described in this Privacy Policy or where otherwise required or permitted by Applicable Law, the Company will not disclose Personal Data to third parties without an appropriate legal basis.

9. International Data Transfers

The Company operates an international technology platform. As a result, Personal Data may be collected, processed, stored, accessed, or transferred in countries other than the country in which the User resides.

Personal Data may be transferred to and processed by the Company, Sky Cliff, Branded Operators, Investment Providers, Funds, SPVs, administrators, custodians, banks, Third-Party Providers, and other authorized participants located in different jurisdictions where such transfer is necessary for the operation of the Platform, the provision of the Services, the administration of Investment Opportunities, or compliance with Applicable Law.

These jurisdictions may have data protection laws that differ from those of the User's country of residence and may not provide the same level of protection as the laws applicable in the User's jurisdiction.

Where Applicable Privacy Laws require specific safeguards for international transfers of Personal Data, the Company shall implement appropriate measures designed to protect Personal Data. Such safeguards may include, where appropriate:

- contractual data protection provisions;
- Standard Contractual Clauses approved by the European Commission or other competent authorities;
- adequacy decisions issued by competent authorities;
- legally recognized transfer mechanisms; or
- other safeguards permitted under Applicable Privacy Laws.

By using the Platform, the User acknowledges that Personal Data may be transferred internationally in accordance with this Privacy Policy and Applicable Privacy Laws.

The Company takes reasonable steps to ensure that recipients of Personal Data implement appropriate technical and organizational measures to protect Personal Data consistent with the requirements of Applicable Privacy Laws.

10. Data Retention

The Company retains Personal Data only for as long as necessary to fulfill the purposes described in this Privacy Policy, comply with Applicable Law, satisfy contractual and regulatory obligations, resolve disputes, enforce legal rights, maintain appropriate business records, and operate the Platform.

The period for which Personal Data is retained depends on the nature of the information, the purpose for which it was collected, the applicable Investment

Opportunity, contractual obligations, legal requirements, and the Company's legitimate business needs.

Without limitation, Personal Data may be retained for purposes including:

- administering User Accounts and maintaining Platform access;
- facilitating current and future Investment Opportunities;
- maintaining investment records and transaction histories;
- complying with recordkeeping, tax, accounting, audit, and reporting obligations;
- facilitating KYC, AML, sanctions, fraud prevention, and other compliance procedures;
- responding to regulatory inquiries, governmental requests, or legal proceedings;
- establishing, exercising, or defending legal claims;
- protecting the security and integrity of the Platform; and
- maintaining backup, disaster recovery, and business continuity records.

Where Personal Data is no longer required for the purposes for which it was collected, the Company will delete, anonymize, or securely dispose of such Personal Data, unless continued retention is required or permitted by Applicable Law, contractual obligations, or the Company's legitimate business interests.

Users acknowledge that certain records, including executed Subscription Documents, Offering Documents, investment records, compliance documentation, communications, audit logs, and transaction histories, may be retained after an Account has been closed or an Investment Opportunity has ended where such retention is necessary to comply with Applicable Law, contractual obligations, legitimate business purposes, or applicable record retention policies.

Where technically feasible and legally permissible, Users may request the deletion of certain Personal Data in accordance with Section 13 (Your Privacy Rights). However, the Company may retain Personal Data where continued retention is required or permitted under Applicable Privacy Laws or Applicable Law.

11. Data Security

The Company is committed to protecting Personal Data against unauthorized access, disclosure, alteration, loss, destruction, misuse, and other unlawful or accidental processing.

The Company maintains administrative, technical, and organizational safeguards that are designed to protect Personal Data appropriate to the nature, sensitivity, and volume of the information processed, the risks associated with such processing, and the requirements of Applicable Privacy Laws.

Depending on the circumstances, such safeguards may include:

- encryption of Personal Data during transmission and, where appropriate, at rest;
- secure authentication mechanisms, including multi-factor authentication where available;
- role-based access controls and least-privilege access principles;
- logging and monitoring of access to systems and sensitive information;
- network, infrastructure, and endpoint security measures;
- regular security updates, vulnerability management, and system maintenance;
- backup, disaster recovery, and business continuity procedures;
- physical, electronic, and procedural safeguards designed to protect Company systems and facilities;
- employee and contractor confidentiality obligations; and
- security assessments of selected Third-Party Providers where appropriate.

Access to Personal Data is limited to personnel, Branded Operators, Investment Providers, Third-Party Providers, and other authorized individuals who require such access to perform their duties, provide the Services, or fulfill contractual, legal, regulatory, or operational obligations.

While the Company implements commercially reasonable safeguards to protect Personal Data, no method of transmission over the Internet, electronic storage system, or information security program can guarantee absolute security.

Accordingly, the Company cannot guarantee that Personal Data will always remain secure or that unauthorized access, disclosure, alteration, or destruction will never occur.

In the event the Company becomes aware of a Personal Data breach, the Company will take such actions as it considers appropriate under the circumstances, including investigating the incident, mitigating its effects, notifying affected individuals and competent authorities where required by Applicable Privacy Laws, and implementing appropriate remedial measures.

Users are responsible for maintaining the confidentiality of their Account credentials, protecting their devices and authentication methods, and promptly notifying the

Company of any suspected unauthorized access to their Account or other security incident.

12. Cookies and Tracking Technologies

The Company uses cookies and similar technologies to operate, secure, maintain, and improve the Platform and the Services.

Cookies are small text files and similar technologies that are stored on a User's device when visiting or using the Platform. They enable the Platform to function properly, remember User preferences, improve security, analyze Platform usage, and enhance the overall User experience.

Depending on the functionality of the Platform, the Company may use the following categories of cookies and similar technologies:

12.1 Essential Cookies

These cookies are necessary for the operation of the Platform and cannot generally be disabled. They may be used to:

- authenticate Users;
- maintain secure login sessions;
- remember security preferences;
- enable core Platform functionality; and
- protect against unauthorized access and fraudulent activity.

12.2 Functional Cookies

These cookies help remember User preferences and improve the usability of the Platform, including:

- language preferences;
- regional settings;
- display preferences;
- saved user settings; and
- other functionality designed to improve the User experience.

12.3 Analytics and Performance Technologies

The Company may use cookies and similar technologies to better understand how the Platform is used, including:

- measuring Platform performance;

- identifying technical issues;
- improving functionality;
- understanding User interactions with the Platform;
- generating aggregated usage statistics; and
- supporting product development and operational improvements.

Where practical, such information is analyzed in aggregated or de-identified form.

12.4 Security Technologies

The Company may use cookies and similar technologies to:

- detect unauthorized access;
- prevent fraud;
- protect User Accounts;
- monitor Platform security;
- maintain system integrity; and
- support cybersecurity measures.

12.5 Managing Cookie Preferences

Where required by Applicable Privacy Laws, Users may manage or withdraw their cookie preferences through the Company's cookie management tools or by adjusting their browser settings.

Please note that disabling certain cookies or similar technologies may affect the availability, functionality, security, or performance of certain features of the Platform.

The Company may update the cookies and similar technologies used by the Platform from time to time as the Platform evolves. Any material changes will be reflected in this Privacy Policy and, where required by Applicable Privacy Laws, through appropriate notice or consent mechanisms.

13. Your Privacy Rights

Subject to Applicable Privacy Laws and any applicable legal or contractual limitations, individuals whose Personal Data is processed by the Company may have certain privacy rights.

Depending on the jurisdiction and the circumstances of the processing, these rights may include the right to:

- request access to Personal Data processed by the Company;

- request correction of inaccurate or incomplete Personal Data;
- request deletion of Personal Data where deletion is permitted by Applicable Privacy Laws;
- request restriction of the processing of Personal Data;
- object to certain processing activities where permitted by Applicable Privacy Laws;
- request the transfer or portability of Personal Data where applicable;
- withdraw consent where processing is based on consent;
- opt out of marketing communications;
- object to certain automated processing where required by Applicable Privacy Laws; and
- lodge a complaint with a competent supervisory or regulatory authority.

The availability and scope of these rights may vary depending on the User's jurisdiction, the legal basis for processing, the nature of the Personal Data, and the Company's legal or contractual obligations.

The Company may decline or limit a request where permitted or required by Applicable Privacy Laws, including where the Company is required to retain Personal Data to comply with legal obligations, protect legal rights, complete contractual obligations, prevent fraud, maintain security, or establish, exercise, or defend legal claims.

To exercise any privacy rights, Users may contact the Company at support@lunedinvestments.

To protect the privacy and security of Users, the Company may request additional information to verify the identity and authority of the person submitting the request before responding.

The Company will respond to privacy requests within the timeframes required by Applicable Privacy Laws.

Where a User believes that the processing of Personal Data violates Applicable Privacy Laws, the User may have the right to submit a complaint to the applicable supervisory authority or other competent regulatory body. The Company encourages Users to contact the Company first so that we may attempt to resolve any concerns directly and efficiently.

14. Third-Party Services and External Links

The Platform may integrate with, connect to, or provide access to services, websites, applications, products, or content provided by Branded Operators, Investment Providers, Funds, SPVs, administrators, custodians, banks, payment service providers, identity verification providers, electronic signature providers, cloud service providers, or other Third-Party Providers.

The Platform may also contain links to external websites or online resources that are not owned or controlled by the Company.

The Company is not responsible for the privacy practices, content, security, availability, or operation of any Third-Party Provider or external website. Such Third-Party Providers operate under their own terms of use, privacy policies, and legal notices, which Users should review before providing Personal Data or using their services.

Where the Company shares Personal Data with Third-Party Providers in accordance with this Privacy Policy, such sharing is undertaken only for the purposes of operating the Platform, providing the Services, facilitating Investment Opportunities, complying with Applicable Law, or otherwise fulfilling the purposes described in this Privacy Policy.

Nothing in this Privacy Policy shall be interpreted as creating responsibility or liability on the part of the Company for the independent privacy practices or data processing activities of any Branded Operator, Investment Provider, Fund, SPV, portfolio company, administrator, custodian, bank, payment service provider, or other Third-Party Provider acting as an independent controller or otherwise processing Personal Data under its own legal authority.

Users are encouraged to review the applicable privacy policies of any Third-Party Provider before using their services or providing Personal Data directly to them.

15. Changes to this Privacy Policy

The Company may amend, update, or modify this Privacy Policy from time to time to reflect changes in the Platform, the Services, Applicable Privacy Laws, regulatory requirements, business practices, technology, or other operational or legal developments.

When this Privacy Policy is updated, the revised version will be made available through the Platform and will become effective on the Effective Date specified in the updated version, unless otherwise required by Applicable Privacy Laws.

Where required by Applicable Privacy Laws or where the Company determines that the changes are material, the Company may notify Users by electronic mail, through the Platform, or by any other communication method reasonably designed to inform Users of the updated Privacy Policy.

The User's continued access to or use of the Platform following the Effective Date of an updated Privacy Policy constitutes acknowledgement of the revised Privacy Policy, except where Applicable Privacy Laws require the User's explicit consent for particular changes.

Users are encouraged to review this Privacy Policy periodically to remain informed about how the Company collects, uses, processes, and protects Personal Data.

The current version number, Effective Date, and Last Updated date of this Privacy Policy are set forth in the Document Information section below.

16. Contact Information and Document Information

If you have any questions about this Privacy Policy, the processing of your Personal Data, or wish to exercise any of your privacy rights, please contact the Company:

Platform Operator

Funds Club Private Markets LLC

A limited liability company organized under the laws of the State of Delaware, United States

Privacy Contact

Email: support@lunedi.investments

The Company will make reasonable efforts to respond to privacy-related requests and inquiries in accordance with Applicable Privacy Laws.

Document Information

Document: Funds Club Privacy Policy

Platform: Funds Club

Platform Operator: Funds Club Private Markets LLC

Software and Intellectual Property Owner: Sky Cliff Professionals GmbH
(Germany, HRB 258208 B)

Version: 1.0

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This Privacy Policy may be updated from time to time in accordance with Section 15 (Changes to this Privacy Policy). The most current version will be made available through the Platform and will supersede all previous versions as of its Effective Date.