

AQUAS Financial LLC

Privacy Policy

Version 2.0 — Last updated June 2026

This Privacy Policy serves as both AQUAS's privacy notice to its consumers and customers under SEC Regulation S-P and the privacy policy for visitors to our websites. The Regulation S-P notice appears first; information for website visitors and state-law privacy rights follows in the final section.

Our commitment to your privacy. AQUAS Financial LLC ("AQUAS," "we," "us," or "our") respects the privacy of the nonpublic personal information of the consumers and customers we serve ("you," "your"). This Privacy Policy describes the nonpublic personal information we collect, how we use it, the limited circumstances in which we may share it, and how we protect it. We provide this notice when your customer relationship is established and annually for as long as you remain a customer.

Scope. This Policy addresses the nonpublic personal information of AQUAS's consumers and customers. It does not address information about AQUAS employees, job applicants, or personnel, which is governed by AQUAS's separate internal policies.

Who this Policy covers

- Consumer — an individual who obtains or has obtained a financial product or service from AQUAS that is used primarily for personal, family, or household purposes.
- Customer — a consumer who has a continuing relationship with AQUAS under which AQUAS provides one or more financial products or services.

Nonpublic personal information we collect. "Nonpublic personal information" ("NPI") means personally identifiable financial information you provide to us, information about your transactions with us, and any list or grouping derived from that information. We collect NPI such as:

- Information you provide on account applications or through our websites and trading platforms — for example, your name, address, email, telephone number, date of birth, tax identification number, and investment objectives;
- Information about the transactions you conduct through AQUAS systems and the services we provide to you;
- Information we receive from consumer-reporting agencies; and
- Information collected through cookies or similar technologies when you use our websites, to the extent that information is linked to you or otherwise constitutes nonpublic personal information (see "Website visitors and state privacy rights").

Where you provide information about another individual in connection with your account (for example, a joint owner, beneficiary, or authorized party), we treat that information as NPI under this Policy.

Biometric information. AQUAS does not collect biometric information. If AQUAS collects biometric information in the future, it will evaluate and protect that information as required by applicable law and, where applicable, as nonpublic personal information under this Policy.

How we use your information. We use your NPI to:

- Provide and administer the brokerage and related services available through our platforms;
- Maintain our books and records and meet our recordkeeping, supervisory, and compliance obligations;
- Comply with applicable legal and regulatory requirements, including anti-money-laundering and tax-reporting obligations;
- Prevent and detect fraud, money laundering, and other crimes or abuse of our services; and
- Respond to your requests and inquiries.

How we share your information. AQUAS does not disclose nonpublic personal information about its consumers or customers to affiliated or nonaffiliated third parties, except as permitted by law. Permitted disclosures are limited to:

- To carry out your transactions — as necessary to effect, administer, or enforce a transaction you request or authorize, including disclosures to depositories, clearing firms, securities exchanges, custodians, counterparties, and others involved in executing, clearing, settling, or reporting your transactions;
- To service providers — to companies that perform services on our behalf, under contracts that require them to keep your information confidential and to use it only for the purposes for which it was disclosed; and
- As required or permitted by law — including regulatory reporting, response to legal process or official requests, and the establishment or defense of legal claims.

Because AQUAS does not share nonpublic personal information in any manner that would trigger opt-out rights under Regulation S-P, this Policy does not include an opt-out election.

We generally apply the same privacy practices and protections described in this Policy to information about our former customers, subject to applicable law.

How we protect your information. AQUAS maintains administrative, technical, and physical safeguards reasonably designed to ensure the security and confidentiality of your NPI, to protect against anticipated threats to its security or integrity, and to protect against unauthorized access or use. These safeguards include automatic encryption of

electronic communications containing NPI, controls that restrict the transmission of NPI to unauthorized destinations, and access restrictions and sensitivity-based handling for records containing NPI. These measures are part of AQUAS's broader information-security program, which is subject to periodic testing and review.

If a breach occurs. AQUAS maintains written policies and procedures for an incident-response program reasonably designed to detect, respond to, and recover from unauthorized access to or use of customer information, including procedures for notifying affected individuals. If AQUAS becomes aware that unauthorized access to or use of sensitive customer information has occurred or is reasonably likely to have occurred, AQUAS will notify each affected individual as soon as practicable, but no later than 30 days after becoming aware of the incident, except as otherwise provided under Regulation S-P. AQUAS also maintains oversight of its service providers, including obtaining assurances that they protect customer information and notify AQUAS of incidents affecting that information.

Keeping your information current; retention. If your information changes, please notify AQUAS Support at support@aquastrading.com. We retain your NPI for as long as necessary to meet our legal, regulatory, tax, books-and-records, and business requirements, and longer where required to preserve records in connection with litigation, investigations, or proceedings (including litigation holds).

Changes to this Policy. This Privacy Policy was last updated in June 2026 (Version 2.0). If we change our privacy practices in a way that affects this notice, we will provide a revised notice before the change takes effect.

How to contact us. If you have questions about this Policy or our privacy practices, please contact the AQUAS Chief Compliance Officer at privacy@aquastrading.com, or AQUAS Support at support@aquastrading.com.

Website Visitors and State Privacy Rights

Cookies and website information. Cookies are small data files a website may store on your device. Depending on how they are used and whether they are linked to you, cookies and similar technologies may collect information about your device, browser, and use of our website. You can usually manage cookies through your browser settings, although disabling cookies may affect site functionality.

California residents. Most of the information AQUAS collects about its customers is financial information that AQUAS collects, processes, discloses, or maintains subject to the federal Gramm-Leach-Bliley Act and its implementing regulations, including SEC Regulation S-P. To that extent, the California Consumer Privacy Act ("CCPA") generally does not apply to that information. AQUAS may also collect limited information from website visitors who are not customers, such as online identifiers and browser information. We do not sell that information. Because that information may not by itself identify you, we may need additional information to verify a request or to determine

whether we can act on it. If you are a California resident and have a question about that limited website-visitor information, contact us at privacy@aquastrading.com.