

This Privacy Policy was last updated March 2025

Our Privacy Policy:

This Privacy Policy (a copy of which can be found at counterpointesre.com (the “Site”)) is designed to help you understand our information collection and processing practices depending on your relationship with us.

This Privacy Policy should be read in conjunction with any other applicable policies and terms and conditions in place between you and Counterpointe Sustainable Advisors LLC and/or its subsidiaries (collectively, “Counterpointe”, “we”, “us” and/or “our”).

Application of this Privacy Policy:

The Site is operated by Counterpointe and has been created to provide information about our company and our origination programs. Our Site visitors (“you”, “your”) can use the Site to tell us about their business and learn about our programs. This Privacy Policy sets forth Counterpointe’s policy with respect to information including personally identifiable data (“Personal Data”) and other information that is collected from Site visitors as well as visitors to any other website operated by Counterpointe.

In addition, this Privacy Policy applies not only to users of our websites but also to interactions you may have with Counterpointe as a private client or counterparty, or otherwise in your individual capacity, or in the capacity of an officer, employee, director, and/or principal of one of our corporate or institutional clients or counterparties (including prospective clients).

Information We Collect:

When you interact with us, we may collect Personal Data and other information from you, as further described below:

Personal Data That You Provide: We collect Personal Data from you when you voluntarily provide such information, such as when you contact us with inquiries or inform us of your business ideas by providing, without limitation, information regarding the stage and sector of your business, your customer and revenue traction and your team. Wherever Counterpointe collects Personal Data on the Site or any other website operated by Counterpointe, we make an effort to provide a link to this Privacy Policy.

By voluntarily providing us with Personal Data, you are consenting to our use of it in accordance with this Privacy Policy. If you provide Personal Data, you acknowledge and agree that such Personal Data may be transferred from your current location to the

offices and servers of Counterpointe and the authorized third parties referred to herein located in the United States.

Other Information:

Non-Identifiable Data: When you interact with Counterpointe, we receive and store certain personally non-identifiable information. Such information, which is collected passively using various technologies, including, without limitation, Google Analytics, cannot presently be used to specifically identify you. Counterpointe may store such information itself or such information may be included in databases owned and maintained by Counterpointe affiliates, agents, or service providers. The Site may use such information and pool it with other information to track, for example, the total number of visitors to our Site, the number of visitors to each page of our Site, and the domain names of our visitors' Internet service providers. It is important to note that no Personal Data is available or used in this process.

In operating our websites, we may use a technology called "cookies." A cookie is a piece of information that the computer that hosts our website gives to your browser when you access the website. Our cookies help provide additional functionality to the website and help us analyze Site usage more accurately. For instance, our website may set a cookie on your browser that allows you to access the website without needing to remember and then enter a password more than once during a visit to the website. In all cases in which we use cookies, we will not collect Personal Data except with your permission. On most web browsers, you will find a "help" section on the toolbar. Please refer to this section for information on how to receive notification when you are receiving a new cookie and how to turn cookies off. We recommend that you leave cookies turned on because they allow you to take advantage of some of the website's features.

In addition, we may use local shared objects, also known as flash cookies, to display content based upon what you view on a website and to personalize your visit. Flash cookies are different from browser cookies because of the amount and type of data and how that data is stored. Cookie management tools provided by your browser will not remove flash cookies.

Aggregated Personal Data: In an ongoing effort to better understand and serve the users of Counterpointe's services, Counterpointe may conduct research on its customer demographics, interests and behavior based on the Personal Data and other information provided to us. This research may be compiled and analyzed on an aggregate basis, and Counterpointe may share this aggregate data with its affiliates, agents, and business partners. This aggregate information does not identify you personally. Counterpointe may also disclose aggregated user statistics in order to describe our services to current and prospective business partners, and to other third parties for other lawful purposes.

Our Use of Your Personal Data and Other Information:

Counterpointe uses the Personal Data you provide in a manner that is consistent with this Privacy Policy. If you provide Personal Data for a certain reason, we may use the Personal Data in connection with the reason for which it was provided. For instance, if you contact us by e-mail, we will use the Personal Data you provide to answer your question or resolve your problem, or if you provide Personal Data in the course of using Counterpointe's services, we will use your Personal Data to adequately respond to your interest in us and to monitor your use of such services. Counterpointe may also use your Personal Data and other personally non-identifiable information collected through one of our websites to help us improve the content and functionality of the website, to better understand our users and to improve Counterpointe. Counterpointe may use this information to contact you in the future to tell you about services we believe will be of interest to you. If we do so, each communication we send you will contain instructions permitting you to "opt-out" of receiving future communications. In addition, if at any time you wish not to receive any future communications or you wish to have your name deleted from our mailing lists, please contact us as indicated below.

If Counterpointe intends on using any Personal Data in any manner that is not consistent with this Privacy Policy, you will be informed of such anticipated use prior to or at the time at which the Personal Data is collected.

Our Disclosure of Your Personal Data and Other Information:

Counterpointe is not in the business of selling your information. We consider this information to be a vital part of our relationship with you. There are, however, certain circumstances in which we may share your Personal Data with certain third parties without further notice to you, as set forth below:

Business Contracts and Transfers: We may use Personal Data for purposes of providing services to you or in connection with fulfillment of our contractual obligations to you. In addition, as we develop our business, we might sell or buy businesses or assets. In the event of a corporate sale, merger, reorganization, dissolution or similar event, Personal Data may be part of the transferred assets.

Related Companies: We may also share your Personal Data with our affiliates for purposes consistent with this Privacy Policy.

Agents, Consultants and Third Parties: Counterpointe, like many businesses, sometimes hires other companies to perform certain business-related functions. Examples of such functions include mailing information, maintaining databases and processing payments. When we employ a third-party to perform a function of this nature, we only provide them with the information that they need to perform their specific function.

Legal Requirements: Counterpointe may disclose your Personal Data if required to do so by law or in the good faith belief that such action is necessary to (i) comply with a legal obligation, (ii) protect and defend the rights or property of Counterpointe, (iii) act in urgent circumstances to protect the personal safety of users of our websites or the public, or (iv) protect against legal liability.

Legitimate Business Purpose: Counterpointe may disclose your Personal Data in connection with other legitimate business purposes of Counterpointe, including but not limited to (i) day to day operational and business purposes; (ii) to take advice from Counterpointe's external legal and other advisors; (iii) board reporting and management purposes, including where required, for quality assurance; (iv) investigation of complaints or reports, including via ethics or whistleblowing systems or reporting hotlines, relating to conduct which is contrary to Counterpointe's values or which may be in breach of applicable laws and regulations; (v) administering surveys and questionnaires, such as for research and client satisfaction purposes; (vi) where necessary, as part of any restructuring relating to Counterpointe, its business or assets, or as part of a merger or sale of Counterpointe or any of its subsidiaries; or (vii) to otherwise protect the rights and property of Counterpointe and the rights, property, and health of other persons, which may include disclosing information about you to authorities when we deem it appropriate to do so.

Your Choices:

You can use our websites without providing any Personal Data. You have the right to opt out of and/or withdraw your consent (where consent is required) to the processing of Personal Data at any time. This will not affect the lawfulness of processing based on consent before its withdrawal. You can withdraw your consent by using the contact information as stated below. If you choose not to provide any Personal Data or withdraw your consent for processing, you may not be able to use certain Counterpointe services.

Exclusions:

This Privacy Policy shall not apply to any unsolicited information you provide to Counterpointe through the Site or through any other means. This includes, but is not limited to, any ideas for new products or modifications to existing products, and other unsolicited submissions (collectively, "Unsolicited Information"). All Unsolicited Information shall be deemed to be non-confidential and Counterpointe shall be free to reproduce, use, disclose, and distribute such Unsolicited Information to others without limitation or attribution.

Children:

Counterpointe does not knowingly collect Personal Data from children under the age of 13. If you are under the age of 13, please do not submit any Personal Data through the

Site. We encourage parents and legal guardians to monitor their children's Internet usage and to help enforce our Privacy Policy by instructing their children never to provide Personal Data on the Site without their permission. If you have reason to believe that a child under the age of 13 has provided Personal Data to Counterpointe through the Site, please contact us, and we will endeavor to delete that information from our databases.

Links to Other Web Sites:

The Site may contain links to other web sites not operated or controlled by Counterpointe (the "Third Party Sites"). The policies and procedures we described here do not apply to the Third Party Sites. The links from the Site do not imply that Counterpointe endorses or has reviewed the Third Party Sites. We suggest contacting those sites directly for information on their privacy policies.

Social Media:

Through the Site, you may be able to choose to access certain social media websites and services that are owned and/or controlled by third parties (including, without limitation, LinkedIn and Twitter) (such websites and services, collectively, the "Social Media Services"). When you elect to access and use the Social Media Services, you will be sharing your information (which will include personal information if you elect to share such information) with those Social Media Services. As with other Third Party Sites, the information that you share with the Social Media Services will be governed by the privacy policies and terms of service of the providers of such Social Media Services and not by the policies and procedures we describe here. The manner in which Social Media Services use, store and disclose your information is governed by the policies of the applicable Social Media Services provider, and, as a result, Counterpointe shall not have any liability or responsibility for the privacy practices or other actions of Social Media Services that may be enabled within and/or otherwise accessible through the Site.

Security:

Counterpointe takes reasonable steps to protect the Personal Data provided via our websites from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. However, no Internet or e-mail transmission is ever fully secure or error free. In particular, e-mail sent to or from our websites may not be secure. Therefore, you should take special care in deciding what information you send to us via this method. Please keep this in mind when disclosing any Personal Data to Counterpointe via the Internet.

Other Terms and Conditions:

Your access to and use of the Site and any other website which is operated by Counterpointe is subject to the Terms of Use.

Changes to Counterpointe' Privacy Policy:

Our websites and our business may change from time to time. As a result, at times it may be necessary for Counterpointe to make changes to this Privacy Policy. Counterpointe reserves the right to update or modify this Privacy Policy at any time and from time to time without prior notice. Please review this policy periodically, and especially before you provide any Personal Data. This Privacy Policy was last updated on the date indicated above.

Contacting Counterpointe:

Please feel free to contact us if you have any questions about Counterpointe's Privacy Policy or the information practices of the Site.

You may contact us as follows: legal@counterpointesre.com