

Privacy Policy

Effective Date: 10th Feb 2026

This Privacy Policy describes how Birch Hill Holdings ("**Birch Hill**," "**we**", "**us**" or "**our**") processes personal information that we collect through our digital and online properties or services that link to this Privacy Policy (including as applicable, our website, electronic communications, and social media pages) as well as our marketing activities and other activities described in this Privacy Policy (collectively, the "**Service**").

This Privacy Policy does not apply to information that we process on behalf of our business customers while providing services to them. Our use of information that we process on behalf of our business customers is governed by our agreements with such customers. If you have concerns regarding your personal information that we process on behalf of our business customer, please direct your concerns to that customer with which you have a relationship.

This Privacy Policy does not apply to representatives of businesses with which we have a business relationship.

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Personal information we collect

Information you provide to us. Personal information you may provide to us through the Service includes:

- **Contact data**, such as your first and last name, alias, signature, salutation, email address, billing and mailing addresses, and phone number.
- **Demographic data**, such as your city, state, country of residence, postal code, gender, physical characteristics, and age.
- **Communications data** based on our exchanges with you, including when you contact us through the Service, communicate with us via email, phone, social media, or otherwise.
- **Marketing data**, such as your preferences for receiving our marketing communications and details about your engagement with them.

- **User-generated content data**, such as any communications you send to other users through the Service as well as your comments, reviews, questions, messages, photos, videos, works of authorship, activations, and other content or information that you generate, transmit, or otherwise make available on the Service, including associated metadata. Metadata includes information on how, when, where and by whom a piece of content was collected and how that content has been formatted or edited. Metadata also includes information that users can add or can have added to their content, such as keywords, geographical or location information, and other similar data.
- **Other data** not specifically listed here, which we will use as described in this Privacy Policy or as otherwise disclosed at the time of collection.

Data about others. We may offer features that help users invite their contacts to use the Service, and we may collect contact details about these invitees so we can deliver their invitations. Please do not refer someone to us or share their contact details with us unless you have their permission to do so.

Third-party sources. We may combine personal information we receive from you with personal information falling within one of the categories identified above that we obtain from other sources, such as:

- **Public sources**, such as credit bureaus, government agencies, public records, social media platforms, and other publicly available sources.
- **Data providers**, such as information services, data licensors/brokers, lead generators and cooperative databases.
- **Service providers** that provide services on our behalf or help us operate the Service or our business.
- **Partners**, such as joint marketing partners and event co-sponsors.

Automatic data collection. We and our service providers may automatically log information about you, your computer or mobile device, and your interaction over time with the Service, our communications and other online services, such as:

- **Device data**, such as your computer or mobile device's operating system type and version, manufacturer and model, browser type, screen resolution, RAM and disk size, CPU usage, device type (e.g., phone, tablet), IP address, unique identifiers, language settings, mobile device carrier, radio/network information (e.g., Wi-Fi, LTE, 3G), and general location information such as city, state or geographic area.
- **Communication interaction data** such as your interactions with our email, text, chat or other communications (e.g., whether you open and/or forward emails) – we may do this through use of pixel tags (which are also known as clear GIFs), which may be embedded invisibly in our emails enabling us to detect if you have opened or forwarded a message.
- **Online activity data**, such as pages or screens you viewed, search history, how long you spent on a page or screen, the website you visited before browsing to the Service, navigation paths between pages or screens, information about your activity on a page or screen, access times and duration of access, and whether you have opened our emails or clicked links within them.

Tracking technologies. Some of the automatic collection described above is facilitated by the following technologies:

- **Cookies**, which are small text files that websites store on user devices and that allow web servers to record users' web browsing activities and remember their submissions, preferences, credentials, and login status as they navigate a site. Cookies used on our sites include both "session cookies" that are deleted when a web browser session ends, "persistent cookies" that remain longer, "first party" cookies that we place and "third party" cookies that our service providers and other third parties place.
- **Local storage technologies**, like HTML5, that provide cookie-equivalent functionality but can store larger amounts of data on your device outside of your browser in connection with specific applications.
- **Web beacons**, also known as pixel tags or clear GIFs, which are used to demonstrate that a webpage or email was accessed or opened, or that certain content was viewed, clicked or forwarded.

How we use your personal information

We may use your personal information for the following purposes or as otherwise described at the time we collect personal information from you:

Service delivery and operations. We may use your personal information to:

- Provide and operate the Service;
- enable security features of the Service;
- personalize the service, including remembering the devices from which you have previously accessed the Service from and remembering your selections and preferences as you navigate the Service;
- communicate with you about the Service, including by sending Service-related announcements, updates, security alerts, and support and administrative messages;
- understand your needs and interests, and personalize your experience with the Service and our communications;
- provide support for the Service, and respond to your requests, questions and feedback;
- to collect and share user testimonials; and
- fraud prevention and security.

Research and development. We may use your personal information for research and development purposes, including to develop, analyze and improve our products and services. As part of these activities, we may create aggregated, de-identified or other anonymous data from personal information. We may use this anonymous or de-identified data and share it with third parties for any lawful business purposes. We do not attempt to reidentify deidentified information derived from personal information, except for the purpose of testing whether our deidentification processes comply with applicable law.

Marketing. We may send you direct marketing communications and may personalize these messages based on your needs and interests. You may opt-out of our marketing communications as described in the [Opt-out of marketing](#) section.

Compliance and protection. We may use your personal information to:

- comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas, court orders, investigations or requests from government authorities;
- protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims);
- audit our internal processes for compliance with legal and contractual requirements or our internal policies;
- enforce the terms and conditions that govern the Service; and
- prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft.

With your consent. In some cases, we may specifically ask for your consent to collect, use, or share your personal information for further purposes, if those purposes are not compatible with the initial purpose for which that personal information was collected.

Cookies and similar technologies. In addition to the other uses included in this section, we may use the [Cookies and similar technologies](#) described above for the following purposes:

- **Technical operation.** To allow the technical operation of the Service.
- **Functionality.** To enhance the performance and functionality of our services.
- **Analytics.** To help us understand user activity on the Service, including the volume and demographics of users, which pages are most and least visited and how visitors move around the Service, as well as user interactions with our emails.

Data sharing in the context of corporate transactions, we may share certain personal information in the context of actual or prospective corporate transactions – for more information, see [How we share your personal information](#), below.

Further uses, in some cases, we may use your personal information for further uses, in which case we will ask for your consent to use your personal information for those further purposes if they are not compatible with the initial purpose for which information was collected.

How we share your personal information

We may share your personal information with the following parties and as otherwise described in this Privacy Policy, in other applicable notices, or at the time of collection.

Affiliates. In some cases, our corporate affiliates might have access to personal information.

Service providers. Third parties that provide services on our behalf or help us operate the Service or our business (such as hosting, internet service providers, information technology, customer support, email delivery, marketing, consumer research and website/data analytics).

Professional advisors. Professional advisors, such as lawyers, auditors, bankers and insurers, where necessary in the course of the professional services that they render to us.

Authorities and others. Law enforcement, government authorities, and private parties in litigation, as we believe in good faith to be necessary or appropriate for the [Compliance and protection purposes](#) described above.

Corporate transactions. We may disclose personal information in the context of actual or prospective business transactions (e.g., investments in Birch Hill, financing of Birch Hill, public stock offerings, the sale, transfer or merger of all or part of our business, assets or shares, liquidation or reorganization). For example, we may need to share certain personal information with prospective counterparties and their advisers. We may disclose your personal information to an acquirer, successor, or assignee of Birch Hill or a portion of our business assets as part of any merger, acquisition, sale of assets, or similar transaction, and/or in the event of an insolvency, bankruptcy, or receivership in which personal information is transferred to one or more third parties as one of our business assets.

Your choices

In this section, we describe the choices available to you.

Opt-out of communications. You may opt-out of marketing-related emails by following the opt-out or unsubscribe instructions at the bottom of the email, or by [contacting us](#). It may take time for your opt-out to be effective. Please note that if you choose to opt-out of marketing-related emails, you may continue to receive service-related and other non-marketing emails. You may opt-out of text messages by texting “STOP” in response to a text that you receive or by other reasonable means.

Cookies. Most browsers let you remove or reject cookies. To do this, follow the instructions in your browser settings. Many browsers accept cookies by default until you change your settings. Please note that if you set your browser to disable cookies, the Service may not work properly. For more information about cookies, including how to see what cookies have been set on your browser and how to manage and delete them, visit <http://www.allaboutcookies.org>.

Blocking images/clear gifs: Most browsers and devices allow you to configure your device to prevent images from loading, so the business hosting the image will not detect that you have viewed a page. To do this, follow the instructions in your particular browser or device settings.

Do Not Track. Some Internet browsers may be configured to send “Do Not Track” signals to the online services that you visit. We currently do not respond to “Do Not Track” signals. To find out more about “Do Not Track,” please visit <http://www.allaboutdnt.com>.

Declining to provide information. We need to collect personal information to provide certain services. If you do not provide the information we identify as required or mandatory, we may not be able to provide those services.

Other sites and services

The Service may contain links to websites, mobile applications, and other online services operated by third parties. In addition, our content may be integrated into web pages or other online services that are not associated with us. These links and integrations are not an endorsement of, or representation that we are affiliated with, any third party. We do not control websites, mobile applications or online services operated by third parties, and we are not responsible for their actions. We encourage you to read the

privacy policies of the other websites, mobile applications and online services you use.

Security

We employ technical, organizational and physical safeguards that are designed to protect the personal information we collect. However, security risk is inherent in all Internet and information technologies, and we cannot guarantee the security of your personal information.

International data transfer

We are headquartered in the United States and may use service providers that operate in other countries. Your personal information may be transferred to the United States or other locations where privacy laws may not be as protective as those in your state, province, or country.

Children and Teens

The Service is not intended for use by anyone under 18 years of age. If you are a parent or guardian of a minor from whom you believe we have collected personal information in a manner prohibited by law, or if information was provided on your behalf when you were under 18, please [contact us](#). If we learn that we have collected personal information through the Service from a child without the consent of the child's parent or guardian as required by law, we will comply with applicable legal requirements to delete the information.

Changes to this Privacy Policy

The "LAST UPDATED" legend at the top of this Privacy Policy indicates when this Privacy Policy was last revised. We reserve the right to modify this Privacy Policy at any time. We will notify you by updating the "Last Updated" date. Depending on the kind of change we make, we may also notify you directly or ask for your consent to the change. Any modifications to this Privacy Policy will be effective upon our posting the modified version or as otherwise indicated at the time of posting.

How to contact us

- **Email:** info@birchhill.io