

Regulation S-P Privacy Notice

Effective Date: 12/31/2025

Overview

Transfer Online, Inc. ("TOL," "we," "us," or "our") is committed to protecting the privacy and security of your personal information. As a registered transfer agent, we maintain records of your ownership of securities on behalf of issuers. Federal law gives you the right to know how we collect, use, share, and protect your nonpublic personal information ("Customer Information"). This privacy notice describes our practices and your rights.

Information We Collect

We collect Customer Information in the course of providing transfer agent services including:

- Name, address, telephone number, and email address
- Social Security Number or Taxpayer Identification Number
- Bank account information (for ACH and dividend payments)
- Share balances, transaction history, and ownership records
- Estate, trust, guardian, or beneficiary documentation
- Copies of communications or documents provided by you or by the issuer
- Information provided by brokers, custodians, consumer reporting agencies, or financial intermediaries on your behalf

We collect this information from:

- Account applications and correspondence
- Transactions and account activity
- Issuers, brokers, custodians, consumer reporting agencies, and financial intermediaries
- Corporate action instructions and filings

How We Use Your Information

We use Customer Information only for purposes permitted by law, including:

- Maintaining your shareholder account
- Processing transfers, issuances, exchanges, and corporate actions
- Distributing dividends, payments, and tax reporting forms
- Handling lost certificate requests, replacement items, and escheatment requirements
- Communicating with you or responding to your inquiries
- Ensuring compliance with legal, regulatory, and issuer requirements
- Preventing fraud or unauthorized transactions
- Supporting proxy or annual meeting processes

We **do NOT** sell your personal information.

How We Share Your Information

We may share Customer Information with:

1. Issuers of the securities you hold
 - a. As their registered transfer agent, we may provide issuers with shareholder information needed to maintain records, meet regulatory obligations, or communicate with shareholders
2. Service providers
 - a. We may share information with service providers who assist us in performing transfer agent functions such as:

- i. Printers and mail houses
 - ii. Corporate action coordinators
 - iii. Electronic delivery providers
 - iv. Banking and payment processors
 - v. Data hosting or secure transmission providers
 - b. **NOTE:** All service providers are required by contract to maintain the confidentiality and security of Customer Information
3. Regulators or Law Enforcement
 - a. We may disclose information when required or permitted by law, such as to:
 - i. SEC, FINRA, or state securities regulators
 - ii. Courts or government agencies
 - iii. Law enforcement to prevent fraud or comply with investigations

We **do NOT** share Customer Information for marketing purposes.

How We Protect Your Information

We maintain administrative, technical, and physical safeguards designed to protect Customer Information, including:

- Access controls and role-based permissions
- Encrypted data transmission
- Secure storage of paper and electronic records
- Monitoring of systems and data access
- Vendor oversight and contractual security obligations
- Employee training on privacy and data protection
- A written Incident Response Program as required under SEC Regulation S-P

Only authorized personnel and approved service providers may access Customer Information.

Your Choices and Rights

Because TOL acts as a registered transfer agent – not a broker or financial advisor – you do not need to take any action to limit our sharing, and federal law does not require or permit “opt-out” options for the types of sharing we perform. We **do NOT** share your personal information with non-affiliated third parties in a manner that requires you to opt-out.

You may:

- Update or correct your account information
- Request copies of certain account records
- Contact us with questions or concerns about data privacy

Former Shareholders

If you cease to be a shareholder, we continue to protect your Customer Information in accordance with this privacy notice and retain records as required under SEC regulations.

Contact Us

If you have any questions about this privacy notice or how we protect Customer Information, please contact:

Transfer Online, Inc.™
512 SE Salmon St.
Portland, OR 97214
+1 (503) 227-2950
info@transferonline.com