## DUNHILL FINANCIAL & DF-DIRECT

## Privacy & Data Retention Policy

Dunhill Financial, LLC and its subsidiary DF-Direct (“we,” “our,” “us”) are committed to protecting your personal information and respecting your privacy. This Privacy & Data Retention Policy explains how we collect, use, share, and safeguard your information in compliance with U.S. Federal Law, the EU and UK General Data Protection Regulation (GDPR), the California Privacy Rights Act (CPRA), and other applicable regulations. It also reflects our SEC, FCA, and MiFID II obligations.

**1. Information we collect**
We collect personal information when you interact with Dunhill Financial or DF-Direct, including when you open an account, request financial planning or advisory services, contact us, or visit our websites. This Policy applies to both www.dunhillfinancial.com and www.df-direct.com, collectively referred to as “our websites.” This may include identifiers such as your name, date of birth, or government ID; contact details such as your address, email, and phone number; financial details such as account numbers, balances, and sources of income; and information about your transactions, portfolio holdings, or use of our client dashboards. We may also collect information about your device, browsing activity, and location when you visit our websites.

**2. How we use your information**
We use your personal information to deliver and improve our financial and investment services, process transactions, comply with legal and regulatory obligations, and communicate with you. We may also contact you with information about our services, subject to your right to opt out of marketing communications at any time.

**3. Legal grounds for processing**
Depending on your location, our legal bases for processing your data may include:

- Contractual necessity: to provide the financial or advisory services you request.
- Legal obligation: to comply with laws and regulations (SEC, FCA, MiFID II, and tax authorities).
- Legitimate interest: to improve services, enhance security, or prevent fraud. - Consent: where required, such as for marketing or the use of cookies.

**4. Sharing your information**
We may share information with our subsidiaries and affiliates, including DF-Direct, as well as with trusted service providers or regulators as needed to provide our services and comply with applicable obligations. In some cases, we may share information with joint marketing partners under strict agreements. We do not sell your personal information, and we do not share it with non-affiliates for their marketing.

**5. Data retention**
We retain personal information only for as long as required by law or regulation. For example, SEC, FCA, and MiFID II rules typically require us to keep client records for five to seven years after the end of a client relationship. After these periods, we securely delete or anonymize the data unless longer retention is legally required. Website analytics and cookie data are generally retained for no longer than twelve months, and marketing subscription data is retained until you

unsubscribe or request deletion.

### 6. How we protect your information

We use technical, organizational, and physical safeguards to protect your information against unauthorized access. This includes encryption, secure servers, access restrictions, and office security measures. Employees receive regular training in data protection, and our systems are tested and monitored to maintain compliance with federal and international standards.

### 7. Your rights

Your privacy rights vary depending on your location, but may include the following:

- All Clients (U.S. GLBA): The right to limit certain information sharing, as described in our client policy.
- EU/UK Clients (GDPR): The right to access, correct, or delete your personal data; the right to restrict or object to processing; the right to data portability; and the right to lodge a complaint with your supervisory authority.
- California Residents (CPRA): The right to know what categories of information we collect, the sources, uses, and with whom it is shared; the right to request deletion; the right to correct inaccurate data; and the right to non-discrimination for exercising your rights. We do not sell or share your personal information as defined under CPRA, so no “Do Not Sell or Share” link is required.

To exercise your rights, please contact us using the details below. We will respond within the legally required timeframes (30 days under GDPR, 45 days under CPRA).

### 8. Cookie Policy (for website visitors only)

When you visit our websites, we may place small text files called cookies on your device. Some cookies are essential for the site to function, while others help us understand how the site is used, so we can improve performance and provide a better user experience. Cookies may also remember your preferences, making your future visits smoother.

We may work with trusted partners who use cookies or similar technologies to measure the effectiveness of our advertising or deliver more relevant content. Where required by law, we will ask for your consent before placing non-essential cookies. You can manage or withdraw your consent at any time through the cookie banner on our website or by adjusting your browser settings. Please note that disabling some cookies may affect how the website functions.

### 9. International Transfers

Your data may be transferred outside your country of residence. Where this occurs, we ensure appropriate safeguards are in place, such as Standard Contractual Clauses or the UK’s International Data Transfer Agreements.

### 10. Contact Us

If you have questions about this Privacy & Data Retention Policy or would like to exercise your privacy rights, please contact us at:


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